

Part II

PASSAIC RIVER STUDY AREA  
DIAMOND ALKALI SUPERFUND SITE  
02-BN

◆ PASSAIC VALLEY SEWERAGE COMMISSIONERS ("PVSC")

STUDY/REPORTS CONDUCTED BY PVSC ON VARIOUS COMPANIES

- 1) ALLIANCE CHEMICAL
- 2) ATLAS REFINERY, INC.
- 3) AUTOMATED ELECTRO-PLATING CO.
- 4) BARTH SMELTING & REFINING CORP.
- 5) B-LINE TRUCKING
- 6) BASF WYANDOTTE CORPORATION
- 7) BENJAMIN MOORE & CO.
- 8) CELLOMER CORP.
- 9) CHEMICAL COMPOUNDS, INC.
- 10) E.I. DuPont De Nemours & Co. (DUPONT)  
(PITT-CONSOL CHEMICALS (CONOCO))

- ☐ Arkansas Company, The
- ☐ Adco Chemical
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_

- 11) ELAN CHEMICAL COMPANY
- 12) ESSEX INDUSTRIAL CHEMICALS COMPANY
- 13) FAIRMOUNT CHEMICAL COMPANY
- 14) MONSANTO INDUSTRIAL CHEMICALS COMPANY
- 15) SERGEANT CHEMICAL COMPANY
- 16) SHERWIN-WILLIAMS CORP.
- 17) SUN CHEMICAL CORP.
- 18) U.S. INDUSTRIAL CHEMICALS COMPANY,  
Div. National Distillers & Chem
- 19) VULCAN MATERIALS COMPANY, CHEMICALS DIVISION
- 20) WALTER KIDDE & CO.

- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_
- ☐ \_\_\_\_\_

849160242

BASF WYANDOTTE CORPORATION

849160247

Return to:

PASSAIC VALLEY SEWERAGE COMMISSIONERS

790 Broad Street

Newark, N. J. 07102

Date: August 3, 1972

Plant Ref. No. ....

## WASTE EFFLUENT SURVEY

(For Industries Served by the Passaic Valley Sewerage Commissioners)

Plant Name: BASF Wyandotte Corporation

Address: 50 Central Avenue, Kearny, New Jersey Zip: 07032

Person and Title to whom any further inquiries should be directed: .....

Mr. W. C. Kraemer, Environmental Manager

Phone No.: 201-589-1600

Number of Employees: 190

Number of Working Days Per Week: 7

Number of Shifts Per Day: 3

Area of Property: 25 Acres, or Sq. Ft.

Type of Industry and 4 digit U. S. Standard Industrial Classification No.: 2818

Finished Product(s): Phthalic Anhydride, Dyestuffs and Dispersions

Average Production: 130 million lbs./year of major product

Raw Materials Used: Xylene, Sulfuric Acid, Caustic, Butyl Acrylate

Brief Description of Operations: This facility manufactures phthalic anhydride, organic dyestuffs, polymerized acrylic dispersions, and plasticizers.

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Water received in *Gallons* (Note: multiply cu. ft. x 7.48)

Purchased water in 1971 from: City of Kearny, New Jersey

1st Quarter 20,000,000

2nd Quarter 26,600,000

3rd Quarter 45,800,000

4th Quarter 50,300,000

Total Purchased 1971: 142,700,000 gal.

#### Well Water

1st Quarter

2nd Quarter

3rd Quarter

4th Quarter

Total well water received in 1971: None

#### River Water

1st Quarter

2nd Quarter

3rd Quarter

4th Quarter

Total river water taken in in 1971: None

TOTAL OF ALL WATER RECEIVED IN 1971: 142.7 million gal.

#### Water Use in 1971:

Water to Product (include evaporated and lost water): 30.9 million gal.

Water to Sanitary Sewer: 111.8 million gal.

Water to Storm Sewer, River or Ditch: Rainfall, approx. 45"/year

TOTAL WATER USE IN 1971: 142.7 million gal.

Name of River, Stream, or Tributary, and location of storm sewer or ditch outlet to river, stream,

or tributary: Passaic River, East Shore, 600 yds south of  
C.N.J. railroad bridge.

849160244



**ANSWER THE FOLLOWING QUESTIONS ONLY IF THE  
PLANT WASTE INCLUDES WASTE ATTRIBUTABLE TO INDUSTRIAL OPERATIONS**

(Note: Analyses should be based on a 24-hour composite sample)

Characteristics of Plant Waste discharged to sanitary or combined sewer, after treatment if any. Indicate units of measure where applicable (e.g. Mg/l).

- a) pH: 7.80 b) Turbidity: >300
- c) Temperature: Ambient d) Radioactive? Yes \_\_\_\_\_ No X
- e) Solids Concentration:
- 1) Total Solids 2,966 Volatile 208 Mineral 2,758
- 2) Suspended Solids 68 Volatile \_\_\_\_\_ Mineral \_\_\_\_\_
- f) Oil and Grease Concentration:
- 1) Floatable Oils 22.6
- 2) Emulsified Oils \_\_\_\_\_
- g) Chlorides 105 mg/l
- h) Chemical Oxygen Demand (C.O.D.): 311
- i) 5-day Bio-chemical Oxygen Demand (B.O.D.): 75
- j) Total organic carbon (T.O.C.): 82
- k) Metallic Ions—Name and concentration (Important—list each metal in waste, e.g., chromium hex. and triv. Antimony, Lead, Mercury, Copper, Vanadium, Nickel; give concentration and total daily discharge of each metal.)
- No heavy metals involved in chemical processing. Microgram amounts of zinc from approved cooling water treatment compound are present.
- l) Toxic Material—Name and concentration e.g., cyanide salts, etc.): \_\_\_\_\_
- No highly toxic compounds are released.
- m) Solvents—Name and concentration: Trace quantities, under 5 ppm of butyl acrylate occasionally present.
- n) Resins—Name and concentration (Lacquers, Varnishes, Synthetics): Polymerized acrylate (colloidal organic solids) less than 50 ppm
- o) Date and time span of sample 7/18-7/19/72 24 hours.

Explain hours, method of discharge of waste to Sanitary Sewer and peak rate of flow, e.g., (continuing for 8 hours per day, 5 days per week at 100 gal./day rate) (batch twice a day for 20 minutes at 100 gal./min.) (Continuous 24 hours steady or with peaks at 2 P.M., peak rate 3 M.G.D.) etc.

Discharge to sanitary sewer is continuous and constant over a 24 hour period. Approx. 5% reduction on weekends.

Characteristics of Plant Discharge to Storm Sewer, River, or Ditch, after treatment if any. Indicate units of measure where applicable (e.g., Mg/l).

- a) pH: ..... 3.2 ..... b) Turbidity: ..... 55 .....  
c) Temperature: ..... Ambient ..... d) Radioactive? Yes ..... No ..... X .....  
e) Solids Concentration:  
1) Total Solids ..... 470 ..... Volatile ..... 160 ..... Mineral .....  
2) Suspended Solids ..... 36 ..... Volatile ..... Mineral .....  
f) Oil and Grease Concentration:  
1) Floatable Oils ..... 29.9 .....  
2) Emulsified Oils .....  
g) Chlorides ..... 50 .....  
h) Chemical Oxygen Demand (C.O.D.): ..... 124 .....  
i) 5-day Bio-chemical Oxygen Demand (B.O.D.): ..... 45 .....  
j) Total Organic Carbon (T.O.C.): ..... 41 .....  
k) Metallic Ions—Name and concentration (Important—list each metal in waste, e.g., chromium hex. and triv. Antimony, Lead, Mercury, Copper, Vanadium, Nickel; give concentration and total daily discharge of each metal.):

..... Negligible quantities of iron oxide from site rain water drainage.

l) Toxic Material—Name and concentration (e.g., cyanide salts, etc.): .....  
..... None .....

m) Solvents—Name and concentration: .....  
..... None .....


n) Resins—Name and concentration (Lacquers, Varnishes, Synthetics): .....  
..... None .....

o) Date and time span of sample: ..... 7/18-7/19/72 ..... 24 hours. ....

Do you pretreat any waste before discharge? ..... Scheduled for 4th Quarter of 1972 .....

If so, describe process and disposal of residue removed: ..... An oil skimmer will be  
..... installed to remove any oils in the storm sewer. Ultimate  
..... disposal to be made by a commercial chemical waste disposal firm. ....

Certification of Laboratory doing sampling and making analyses shall be given. Procedures shall be those shown in the 13th edition of Standard Methods for the Examination of Water and Wastewater, where applicable. If no procedure is applicable, the laboratory is to describe method and procedure used in analyses.

 Wm. C. Kramer PE

Signature and title of person preparing report  
Environmental Manager  
Colors and Chemicals Group

849160246

BENJAMIN MORE & CO.

849160270



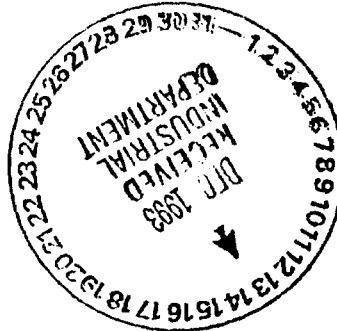
# Benjamin Moore & Co.

Paints • Stains • Clear Finishes

NEWARK PLANT • 134 LISTER AVENUE • NEWARK, NEW JERSEY 07105-4566 • (201) 344-1200 • FAX: (201) 344-2710

December 9, 1993

Mr. Frank D'Ascensio  
Manager of Industrial  
and Pollution Control  
Passaic Valley Sewerage Commission  
600 Wilson Avenue  
Newark, NJ 07105



RE: Passaic Valley Discharge

Dear Mr. D'Ascensio:

On December 3, 1993, Mrs. Andrea Hall of the Division of Water/Sewer Utility, City of Newark, New Jersey visited the Newark Operation Benjamin Moore and Company at my request. During this visit we investigated the affect of a discharge of sewerage from a facility downstream from Newark Operations. Our observations reveal that although one of the relevant manholes was unobstructed there is a significant amount of silting in others. Severe silting exists somewhere in the sewer line within one to two hundred yards of the Newark Operations Physical Connection.

As a consequence of this silting Newark Operations has erroneously reported volumes of discharge downstream to your office every month. You are aware, Newark Operations is a zero point source discharge operation. Our reports resulted from an unintentional oversight. It was assumed the problem was caused by tidal effects on the sewer line. Only careful study revealed that this was not the case.

On Thursday, December 9, 1993, the City of Newark sent crews to clean the sewer line. We hope as a consequence of this effort that the sewer lines will be opened up. Ms. Andrea Hall is working closely with my office regarding this matter. Should their primary efforts be unsuccessful Ms. Hall assured me City of Newark would continue to provide the necessary assistance to completely resolve the matter.

We are formally advising your office by this communication that Newark Operations has had a problem. With your help we have hopefully resolved this problem. Once we have re-established "normal operation" (a few weeks discharge) we will contact your office for a formal meeting.

Should you have any questions please call.

Sincerely,

*Charles J. Ilsley*

Charles J. Ilsley  
Chemist

CJL:mjb

cc: K. Marino, R. Fallon, Ms. Andrea Hall

MGR (FD)	_____
RIVER (FC)	_____
OPS (TM)	_____
MONIT (MG)	<i>X</i> _____
LAB (AM)	<i>follow up</i> _____



1141-3801  
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December 17, 1992

Mr. Mario Graglia  
Supervisor Monitoring & Surveillance  
Industrial Department  
Passaic Valley Sewerage Authority  
Newark, New Jersey 07105

Dear Mr. Graglia:

As a consequence of a flooding condition sustained last Friday at the Benjamin Moore Plant, our LEL developed a depressed base line. The filters were changed because they were wet with water. Obviously water was sucked into the monitoring device during sampling.

Control Instruments, Fairfield, New Jersey is scheduled for Monday, December 21st, to make repairs and clean the instrument.

Nadine Peace was notified by telephone call on Tuesday, December 15th.

We will follow up with a letter to document the repair/cleaning of the instrument once this has occurred.

Should you have any questions or concern, please call.

Sincerely yours,

Charles J. Ilsley, Jr.  
Process Chemist

CJI/je  
cc: CMKaris  
RJFallon

LISTER AVENUE

MISSISSAUGA VALLEY SEWERAGE AUTHORITY

METER READING FOR CENTRAL LAG composite sample

paper mill

TYNERS SHED

SHOWER SYSTEM WATER LINE

INDUSTRIAL WATER LINE

SANITARY SEWAGE LINE

SANITARY SEWAGE LINE

METER READING FOR CENTRAL LAG

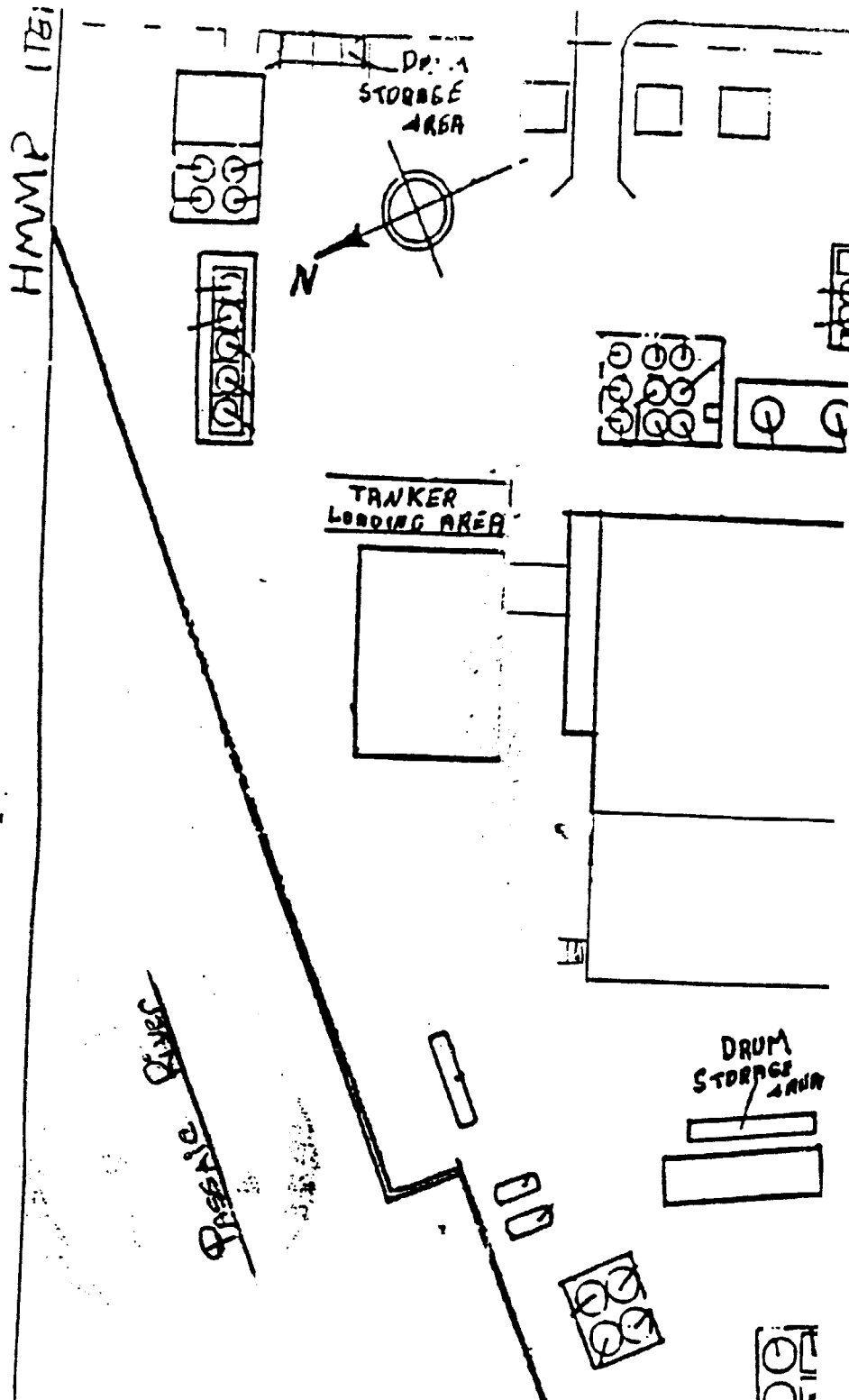
MAIN TANK PLANT

DRUM STORAGE AREA

DRUM STORAGE AREA

849160250







**Benjamin Moore & Co.**

PAINTS • VARNISHES • ENAMELS

MONTVALE  
NEW YORK  
NEWARK  
BOSTON  
RICHMOND  
JACKSONVILLE

CHICAGO  
ST. LOUIS  
CLEVELAND  
HOUSTON  
BIRMINGHAM

DENVER  
LOS ANGELES  
SANTA CLARA  
TORONTO  
MONTREAL  
VANCOUVER

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105

August 17, 1988

Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, New Jersey 07105

Re: OCPSF Baseline Monitoring  
Report

Dear Sir:

We are in receipt of your August 9th letter advising us of additional information required on the above referenced report. Listed below are our responses to your request, numbered according to your Baseline Monitoring Report Checklist.

3c SIC number clarification

Our SIC code is 2851 (paint manufacturing, etc). While Category 40 CFR 414 does not list this SIC number we believe we are covered as a secondary producer of regulated material, alkyd resin.

3d Category and subpart

We are covered under Category 40 CFR 414 Subpart E.

4d&4e Flow diagram with regulated volumes and sample points

A revised flow diagram is attached.

5b Methyl Chloride and 4,6 Dinitro-o-cresol

Attached are Laboratory Reports from Garden State Laboratories (Lab #07044) which verify that no 4,6 Dinitro-o-cresol was present in the samples they tested. The Methyl Chloride was reported in the initial findings as Chloromethane, an acceptable synonym. The level of Chloromethane was negligible in all samples.

849160252

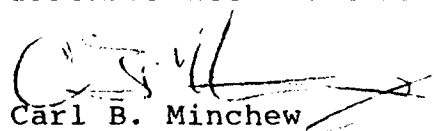
- 6a Out of compliance Toluene, Ethyl Benzene, Naphthaline  
and Benzene

We acknowledge that these chemicals were out of compliance in the samples tested. At this time we are using a revised system which does not result in any discharge to the sanitary sewer system. We are, therefore, in compliance. An air pollution control device permit is in the works for the new system, until it is received we do not consider the installation permanent.

Please contact the writer with any comments or if further clarification is required.

Very truly yours,

BENJAMIN MOORE & COMPANY

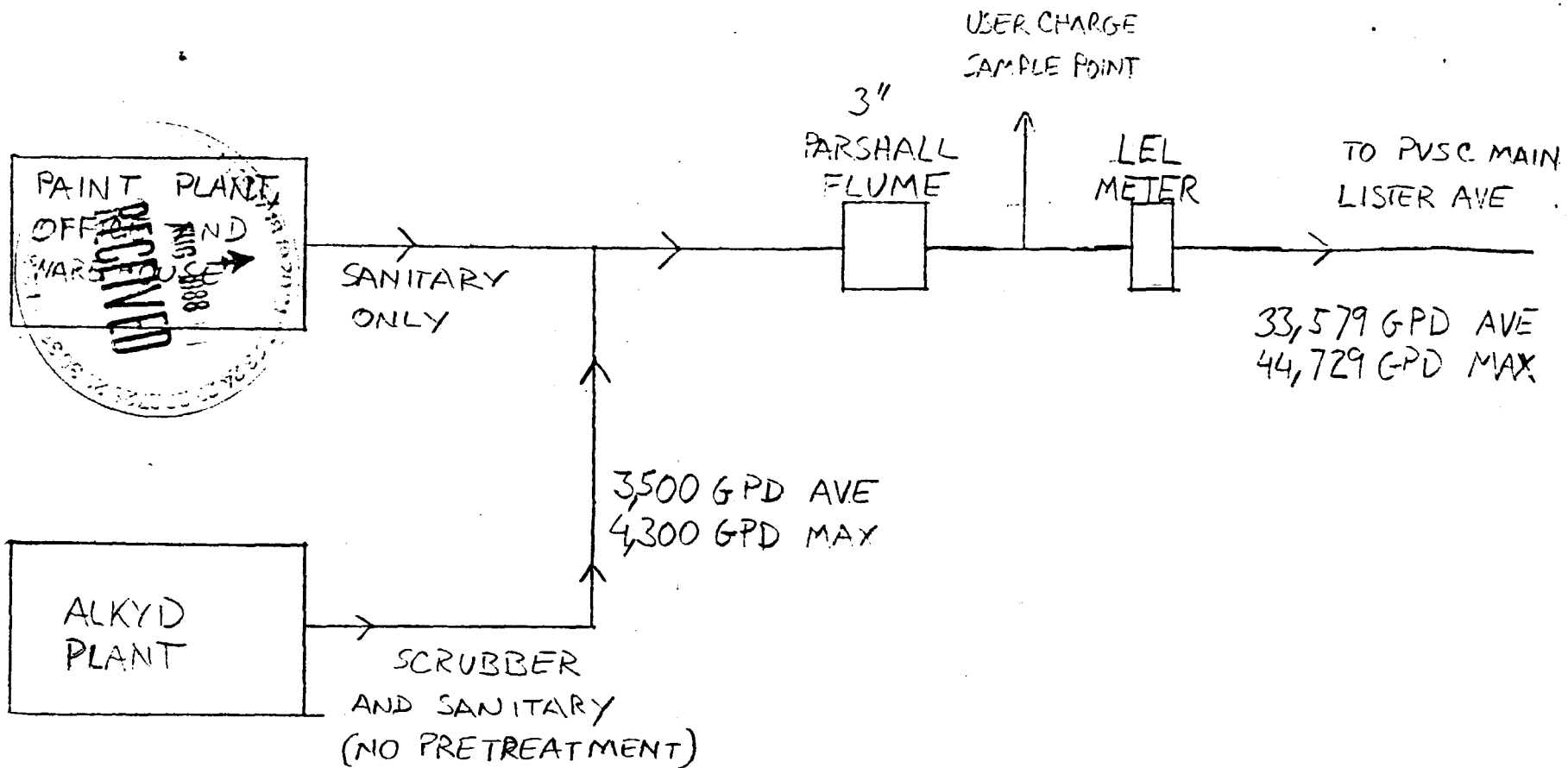
  
Carl B. Minchew  
Plant Manager

Attachments

CBM/je



849160253



SANITARY SEWER FLOW DIAGRAM

BENJAMIN MOORE + Co.  
134 LISTER AVE  
NEWARK, NJ 07105

AUGUST 11, 1988 CBM



# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8900

Fax (201) 688-8966

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

TO: BENJAMIN MOORE & CO

134 LISTER AVENUE

## REPORT OF ANALYSIS ACID EXTRACTABLE COMPOUNDS

REPORT # 80519068

CLIENT # M0001

DATE SUBMITTED: 5/19/88

NEWARK

NJ 07105

ATT: LARRY BERG

SAMPLE TYPE: WATER

SAMPLE ID: OCPSF

SAMPLE LOCATION: @UECHILLE PLANT

DATE SAMPLED: 5/19/88

TIME SAMPLED:

COMPOUND	RESULT	COMPOUND	RESULT
4-CHLORO-3-METHYLPHENOL	<10.0	4-NITROPHENOL	<10.0
2-CHLOROPHENOL	<10.0	PENTACHLOROPHENOL	<10.0
2,4-DICHLOROPHENOL	<10.0	PHENOL	<10.0
2,4-DIMETHYLPHENOL	<10.0	2,4,6-TRICHLOROPHENOL	<10.0
2,4-DINITROPHENOL	<10.0	4,6 DINITRO-O-CRESOL	NON DETECTED
2-METHYL4,6-DINITROPHENOL	<10.0	DATE EXTRACTED	5/24/88
2-NITROPHENOL	<10.0	DATE ANALYZED	6/6/88

TEST RESULTS ARE IN PARTS PER BILLION.

<=LESS THAN, NONE DETECTED.

ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY, USEPA METHOD 625.

GC/MS RUN PERFORMED BY EMS LABS, #15548.

849160255

THE LIABILITY OF GARDEN STATE LABORATORIES, INC. FOR SERVICES RENDERED SHALL IN NO EVENT EXCEED THE AMOUNT OF THE INVOICE.

Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.F.D. - Lab. #07044



# GARDEN STATE LABORATORIES, INC.

*Bacteriological and Chemical Testing*

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8900

Fax (201) 688-8966

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

TO: BENJAMIN MOORE & CO

134 LISTER AVENUE

## REPORT OF ANALYSIS ACID EXTRACTABLE COMPOUNDS

REPORT # 80526020

CLIENT # M0001

DATE SUBMITTED: 5/26/88

NEWARK

NJ 07105

ATT: LARRY BERG

SAMPLE TYPE: WATER

SAMPLE ID:

SAMPLE LOCATION:

DATE SAMPLED: 5/26/88

TIME SAMPLED: 9:20 AM

COMPOUND	RESULT	COMPOUND	RESULT
4-CHLORO-3-METHYLPHENOL	<10.0	4-NITROPHENOL	<10.0
2-CHLOROPHENOL	<10.0	PENTACHLOROPHENOL	<10.0
2,4-DICHLOROPHENOL	<10.0	PHENOL	<10.0
2,4-DIMETHYLPHENOL	<10.0	2,4,6-TRICHLOROPHENOL	<10.0
2,4-DINITROPHENOL	<10.0	4,6 DINITRO-O-CRESOL	NON DETECTED
2-METHYL 4,6-DINITROPHENOL	<10.0	DATE EXTRACTED	5/31/88
2-NITROPHENOL	<10.0	DATE ANALYZED	6/10/88

TEST RESULTS ARE IN <sup>1000</sup> PARTS PER BILLION.

<= LESS THAN, NONE DETECTED

ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY, USEPA METHOD 625.

GC/MS RUN PERFORMED BY EMS LABS, #15548.

849160256

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Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.E.P. -- Lab #07044





# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8901

Fax (201) 688-8961

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

TO: BENJAMIN MOORE & CO

134 LISTER AVENUE

## REPORT OF ANALYSIS ACID EXTRACTABLE COMPOUNDS

REPORT # 80527016

CLIENT # M0001

DATE SUBMITTED: 5/27/88

NEWARK

NJ 07105

ATT: LARRY BERG

SAMPLE TYPE: WATER

SAMPLE ID:

SAMPLE LOCATION:

DATE SAMPLED: 5/27/88

TIME SAMPLED: 9:00 AM

COMPOUND	RESULT
4-CHLORO-3-METHYLPHENOL	<10.0
2-CHLOROPHENOL	<10.0
2,4-DICHLOROPHENOL	<10.0
2,4-DIMETHYLPHENOL	<10.0
2,4-DINITROPHENOL	<10.0
2-METHYL 4,6-DINITROPHENOL	<10.0
2-NITROPHENOL	<10.0

COMPOUND	RESULT
4-NITROPHENOL	<10.0
PENTACHLOROPHENOL	<10.0
PHENOL	<10.0
2,4,6-TRICHLOROPHENOL	<10.0
4,6 DINITRO-O-CRESOL	NON DETECTED
DATE EXTRACTED	5/31/88
DATE ANALYZED	6/10/88

TEST RESULTS ARE IN PARTS PER BILLION.

<= LESS THAN, NON DETECTED.

ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY, USEPA METHOD 625.

GC/MS RUN PERFORMED BY EMS LABS, #15548.

RECEIVED

849160257

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Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.E.P. - Lab #07044



# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-89

Fax (201) 688-89

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

TO:

## REPORT OF ANALYSIS ACID EXTRACTABLE COMPOUNDS

REPORT # 80531000

CLIENT #

DATE SUBMITTED:

ATT:

SAMPLE TYPE: BLANK

SAMPLE ID: FOR SAMPLES EXTRACTED 5/31/88

SAMPLE LOCATION:

DATE SAMPLED:

TIME SAMPLED:

COMPOUND	RESULT
4-CHLORO-3-METHYLPHENOL	<10.0
2-CHLOROPHENOL	<10.0
2,4-DICHLOROPHENOL	<10.0
2,4-DIMETHYLPHENOL	<10.0
2,4-DINITROPHENOL	<10.0
2-METHYL-4,6-DINITROPHENOL	<10.0
2-NITROPHENOL	<10.0

COMPOUND	RESULT
4-NITROPHENOL	<10.0
PENTACHLOROPHENOL	<10.0
PHENOL	<10.0
2,4,6-TRICHLOROPHENOL	<10.0
4,6 DINITRO-O-CRESOL	NON DETECTED
DATE EXTRACTED	5/31/88
DATE ANALYZED	6/11/88

TEST RESULTS ARE IN PARTS PER BILLION.

<=LESS THAN, NONE DETECTED.

ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY, USEPA METHOD 625.

GC/MS RUN PERFORMED BY LABS #15548.

849160258

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Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J. Dept. of Environmental Protection



# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8900

Fax (201) 688-8900

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

TO:

## REPORT OF ANALYSIS ACID EXTRACTABLE COMPOUNDS

REPORT # 80524000

CLIENT #

DATE SUBMITTED:

ATT:

SAMPLE TYPE: BLANK

SAMPLE ID: FOR SAMPLES EXTRACTED 5/24/88

SAMPLE LOCATION:

DATE SAMPLED:

TIME SAMPLED:

COMPOUND	RESULT
4-CHLORO-3-METHYLPHENOL	<10.0
2-CHLOROPHENOL	<10.0
2,4-DICHLOROPHENOL	<10.0
2,4-DIMETHYLPHENOL	<10.0
2,4-DINITROPHENOL	<10.0
2-METHYL4,6-DINITROPHENOL	<10.0
2-NITROPHENOL	<10.0

COMPOUND	RESULT
4-NITROPHENOL	<10.0
PENTACHLOROPHENOL	<10.0
PHENOL	<10.0
2,4,6-TRICHLOROPHENOL	<10.0
4,6 DINITRO-O-CRESOL	NON DETECTED
DATE EXTRACTED	5/24/88
DATE ANALYZED	6/12/88

TEST RESULTS ARE IN PARTS PER BILLION.

<=LESS THAN; NONE DETECTED.

ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY, USEPA METHOD 625.

GC/MS RUN PERFORMED BY LMS LABS, #15548.

849160259



**Benjamin Moore & Co.**

PAINTS • VARNISHES • ENAMELS

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105-4566

NEWARK PLANT

(201) 344-1200

June 27, 1988

Passaic Valley Sewer Commissioners  
42 Wilson Avenue  
Newark, New Jersey 07105

RE: OCPSF Baseline Monitoring Report, Addendum

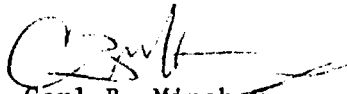
Dear Sirs,

The attached Report from Garden State Laboratories, report of Volatile Organic Analysis May 26, 1988, was not included in our BASELINE MONITORING REPORT filed June 20, 1988.

The results were available and summarized in our cover letter, only the paper work was missing. Please include this report with our BMR.

We apologize for any inconvenience this may have caused, please contact the writer with any comments or questions.

Sincerely,

  
Carl B. Minchew  
Plant Manager

CBM/ip



*Our 105<sup>th</sup> Year*

849160260



# GARDEN STATE LABORATORIES, INC.

Bacteriological and Chemical Testing

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-890

Fax (201) 688-896

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

## REPORT OF VOLATILE ORGANIC ANALYSIS

TO: BENJAMIN MOORE & CO.  
134 LISTER AVENUE

REPORT # 80526020

CLIENT # M0001

DATE SUBMITTED: 5/26/88

NEWARK

NJ 07105

ATT: LARRY BERG

SAMPLE TYPE: WATER

SAMPLE ID: TRIP BLANK

SAMPLE LOCATION:

DATE SAMPLED:

TIME SAMPLED:

COMPOUND	RESULT	COMPOUND	RESULT
Chloromethane	<1.0	1,1,2 Trichloroethane	<1.0
Bromomethane	<1.0	cis-1,3 Dichloropropylene	<1.0
Dichlorodifluoromethane	<1.0	Benzene	<1.0
Dipyl Chloride	<1.0	2-Chloroethylvinyl ether	<1.0
Chloroethane	<1.0	Bromoform	<1.0
Methylene Chloride	<1.0	1,1,2,2 Tetrachloroethane	<1.0
Trichlorofluoromethane	<1.0	Tetrachloroethylene	<1.0
1,1 Dichloroethylene	<1.0	Toluene	<1.0
1,1 Dichloroethane	<1.0	Chlorobenzene	<1.0
trans-1,2 Dichloroethylene	<1.0	Ethylbenzene	1.5
Chloroform	1.5	p-Hylene	4.7
1,2 Dichloroethane	<1.0	m-Hylene	4.5
1,1,1 Trichloroethane	<1.0	o-Hylene	<1.0
Carbon Tetrachloride	<1.0	1,2 Dichlorobenzene	<1.0
Bromodichloromethane	<1.0	1,3 Dichlorobenzene	<1.0
1,2 Dichloropropane	<1.0	1,4 Dichlorobenzene	<1.0
trans-1,3 Dichloropropene	<1.0	1,2,4 Trichlorobenzene	<1.0
Trichloroethylene	<1.0	DONE BY GC/MS	6/10/88
Dibromochloromethane	<1.0		
Methyl tert-Butyl Ether	<1.0		
Isopropyl Ether	<1.0		

RESULTS ARE IN PARTS PER BILLION.

849160261

LESS THAN, NONE DETECTED. ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY  
US EPA METHOD 624.

THE LIABILITY OF GARDEN STATE LABORATORIES, INC. FOR SERVICES RENDERED SHALL IN NO EVENT EXCEED THE AMOUNT OF THE INVOICE.

Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J. DEP - Lab #07044



# GARDEN STATE LABORATORIES, INC.

*Bacteriological and Chemical Testing*

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8900

Fax (201) 688-8966

MATHEW KLEIN, M.S., Director

HARVEY KLEIN, M.S., Lab. Supervisor

## REPORT OF VOLATILE ORGANIC ANALYSIS

TO: BENJAMIN MOORE & CO.  
134 LISTER AVENUE

REPORT # 80526020

CLIENT # M0001

DATE SUBMITTED: 5/26/88

NEWARK

NJ 07105

ATT: LARRY BERG

SAMPLE TYPE: WATER

SAMPLE ID:

SAMPLE LOCATION:

DATE SAMPLED: 5/26/88

TIME SAMPLED: 9:20 AM

COMPOUND	RESULT	COMPOUND	RESULT
Chloromethane	<1.0	1,1,2 Trichloroethane	<1.0
Bromomethane	<1.0	cis-1,3 Dichloropropylene	<1.0
Dichlorodifluoromethane	<1.0	Benzene	9.1
Vinyl Chloride	<1.0	2-Chloroethylvinyl ether	<1.0
Chloroethane	<1.0	Bromoform	<1.0
Methylene Chloride	<1.0	1,1,2,2 Tetrachloroethane	<1.0
Trichlorofluoromethane	<1.0	Tetrachloroethylene	<1.0
1,1 Dichloroethylene	<1.0	Toluene	88.0
1,1 Dichloroethane	<1.0	Chlorobenzene	<1.0
trans-1,2 Dichloroethylene	<1.0	Ethylbenzene	502.0
Chloroform	5.6	p-Xylene	1557.0
1,2 Dichloroethane	<1.0	m-Xylene	1407.0
1,1,1 Trichloroethane	<1.0	o-Xylene	<1.0
Carbon Tetrachloride	<1.0	1,2 Dichlorobenzene	<1.0
Bromodichloromethane	<1.0	1,3 Dichlorobenzene	<1.0
1,2 Dichloropropane	<1.0	1,4 Dichlorobenzene	<1.0
trans-1,3 Dichloropropene	<1.0	1,2,4 Trichlorobenzene	<1.0
Trichloroethylene	<1.0	DONE BY GC/MS	6/10/88
Dibromochloromethane	<1.0		
Methyl tert-Butyl Ether	<1.0		
Isopropyl Ether	<1.0		

RESULTS ARE IN PARTS PER BILLION.

LESS THAN, NONE DETECTED. ANALYSIS PERFORMED BY GAS CHROMATOGRAPHY/MASS SPECTROMETRY  
USE EPA METHOD 624.

THE LIABILITY OF GARDEN STATE LABORATORIES, INC. FOR SERVICES RENDERED SHALL IN NO EVENT EXCEED THE AMOUNT OF THE INVOICE.

Certified by U.S. Public Health Service, N.J. Dept. of Health and N.J.D.E.P. - Lab #07044



MEMORANDUM

TO: Mario Graglia

FROM: Nadine Peace *NP*

DATE: May 5, 1987

SUBJECT: pH RESULTS

The following company had low pH result:

		<u>WO #</u>	<u>WO Date</u>	<u>Result</u>
20403111	Benjamin Moore	I-31797	05/01/87	3.62*

\*Analytical results not for enforcement purposes for internal use only.

NP/mc

849160263



114-8858  
**Benjamin Moore & Co.**

PAINTS • VARNISHES • ENAMELS

MONTVALE  
NEW YORK  
NEWARK  
BOSTON  
RICHMOND  
JACKSONVILLE

CHICAGO  
ST. LOUIS  
CLEVELAND  
HOUSTON  
PITTSBURGH

DEN  
LOS  
SANTA CLAY  
TORONTO  
MONTREAL  
VANCOUVER

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105

ENGINEERING DEPARTMENT

June 12, 1986

Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, NJ 07105

Attention: Mr. Joseph D. Gourley .

Reference: Our Job #85-4, Sewerage Flash Point Monitoring

Dear Mr. Gourley:

With regard to the frequent high level alarms which we are experiencing with the LEL meter, our maintenance people had the distributor's engineer in to check over the instrument and it appears there may be a problem with the span adjustment, which could not be verified because the span gas cylinder is almost empty due, apparently, to a leak somewhere in the system.

If we continue to have problems after the instrument has been properly recalibrated it will become necessary for us to seal off the Parshall flume pit since it is quite evident that hydrocarbons in the ambient air are giving us a false alarm. At approximately 1:15 P.M. on Tuesday of this week the instrument was indicating a 60% level which of course signalled an alarm situation. There was a strong odor in the area which was familiar but which I could not identify, so I had one of our research chemists come to the area with his "educated" nose. He identified the aroma as an alcohol, probably a C-9 alcohol, an item which we do not use. The winds at the time were from the southeast and we assume that the vapors were being carried to our property by the air currents. This was confirmed by operating the zero/test push button which switches the instrument over to ambient air. Doing this resulted in no discernible change in the meter reading. I cannot imagine that what we were smelling was 60% of the LFL (LEL) so there is a good chance that the calibration is way out of adjustment. (The maintenance department is presently waiting for a replacement cylinder.)

849160264

114-8858

Passaic Valley Sewerage Commissioners  
Mr. Joseph D. Gourley  
Job #85-4, Sewerage Monitoring

June 12, 1986  
Page 2

Incidentally, at the time of Tuesday afternoon's alarm I did check our resin plant operation to verify that nothing was being discharged from that source.

Very truly yours,

BENJAMIN MOORE & CO.

*G. A. Lehnert*

Garry A. Lehnert, P.E.  
Chief Engineer

GAL:mjh

cc: Mr. Carl Minchew

849160265



DATE OF VISIT

January 8, 1985

COMPANY NAME

Benjamin Moore

344-1200

COMPANY REP

Gary Lehnert, Plant Engineer

PVSC REP

M. Gunster

PURPOSE

LFL Compliance

SUMMARY:

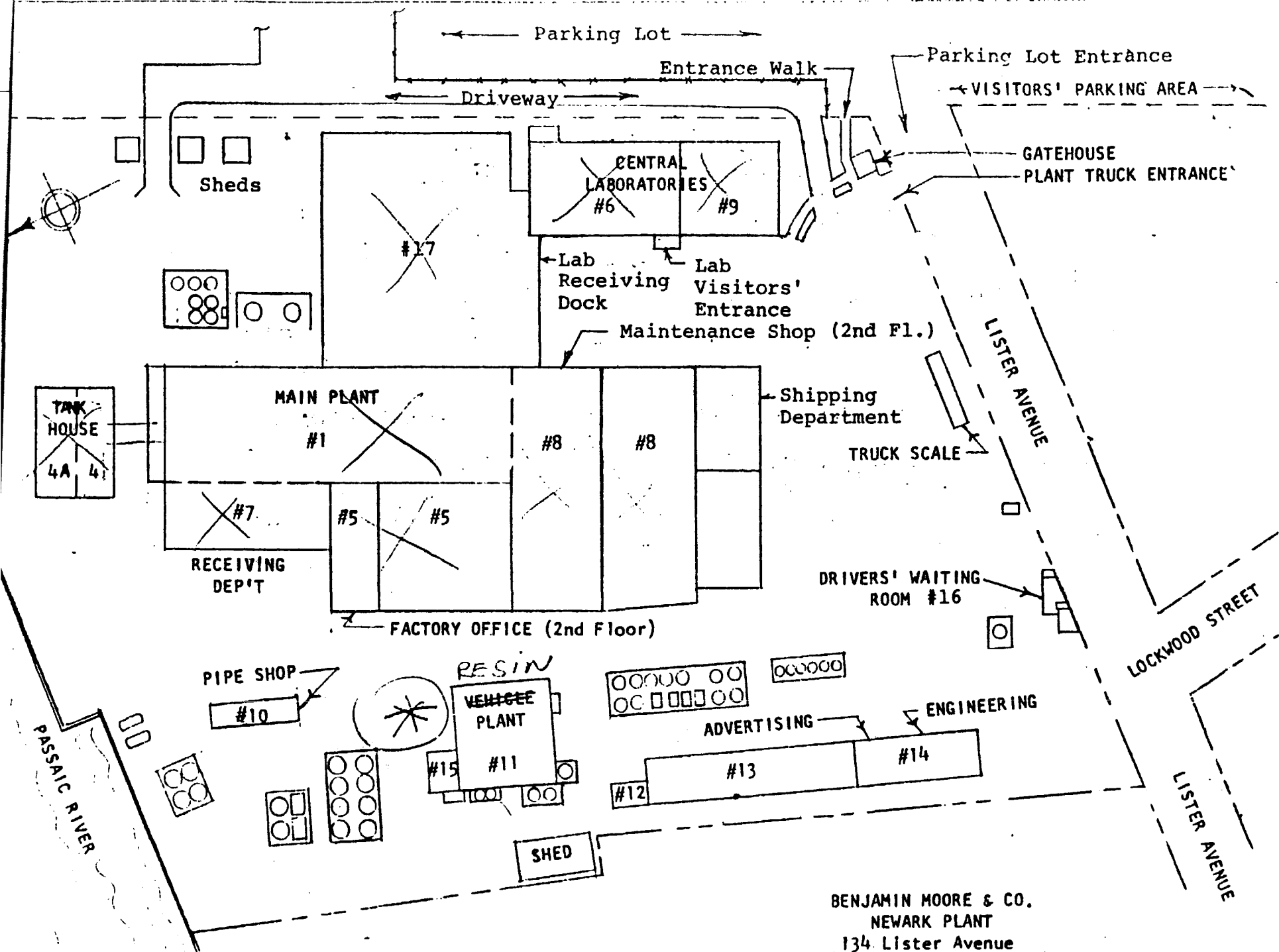
According to Mr. Lehnert the paint manufacture building numbers 1,4,5,7,8,17, have no floor drains or industrial outlet to the sewer.

Central R & D Lab buildings # 6 & 9 waste products that contain solvents are held in drums for proper removal. The company stores 160,000 gals class II flammable liquid category paint solvents. With a flash point of 100 to 140 ,F. This solvent is stored in dyked area with no sanitary sewer access. The only operation containing solvents that are discharged to PVSC is in the "Resen Plant #11. In the manufacturing of alkyd resins, there is a discharge of decanter water which contains approximately 1/10 of 1% "xylol or ethyl benzine." The company feels because this is the only source of solvent contaminated water and is only 160 gal/day roughly. They would like to discontinue the procedure of discharge to the sanitary sewer altogether and either recycle or generally reuse the liquid in a similiar paint batch.

Mr. Lehnert also noted that an LEL recorder would not register the flammable level of most of their stored solvents because of their high flush point. Mr. Lehnert would like to know if they discontinued discharge of all solvent water to PVSC, would that negate the need for a LEL meter.



M. Gunster



BENJAMIN MOORE & CO.  
NEWARK PLANT  
134 Lister Avenue

## INDUSTRIAL WORK ORDER

DATE

6/22/81

WORK ORDER NO

G-1232

COMPANY NAME

BENJAMIN MOORE &amp; Co

LOCATION

134 Lister Ave. Newark

PERMIT NO.

#2040 3112-

CONTACT

Mr. L. Chrest

2 outlets

VIOLATION

Y N U

DISCHARGE VIOLATION CONTROL NO. \_\_\_\_\_

TASK CODE

COMPLIANCE DUE DATE \_\_\_\_\_

1. ☐ INSTALL SAMPLER(UC)  
2. ☐ INSTALL SAMPLER (UC & PRT)  
3. ☐ PICK-UP SPLIT SAMPLE (UC)  
4. ☐ PICK-UP SPLIT SAMPLE (UC & PRT)  
5. ☐ READ METER

6. ☐ DISCHARGE VIOLATION REVIEW  
7. ☐ COMPLIANCE REVIEW  
8. ☐ COMPLAINT  
9. ☐ INTERFERENCE/UPSET INVESTIGATION  
10. ☒ OTHER

SPECIAL INSTRUCTIONS \_\_\_\_\_

ASSIGNED TO

SABO

BY

m. Magliola

DATE

6-22-81

TASK (S) COMPLETED (BY CODE) \_\_\_\_\_

LAB WORK ORDER \_\_\_\_\_

SAMPLE RECEIVED BY

JC

LAB TEST REQUIRED \_\_\_\_\_

DESCRIPTION

~~pH test on 2 original Hg samples - picked up~~  
~~one each after April, May, June Hg samples for 6-22-81~~  
- one sample original pH was 12.8 - investigation contained  
on separate sheet

REPORT TO FOLLOW

Y N

DATE

6-23-81

SIGNATURE

John Sabo

REVIEWED BY

m. Magliola

VERIFIED BY \_\_\_\_\_

DATE

6/25/81

DATE \_\_\_\_\_

849160268



File - Benj. Moore

- during the addition of  $\text{HNO}_3$  for the Hg program, I noticed that the original pH for sample point #1 was 12.8. Investigation led to this statement from the company (Keith)

sample is drawn from <sup>bottom of</sup> sample pit which they believe is the overflow or backwash from the sewer lines in the area. On Saturday 6-27-81, Benjamin Moore is going to tap the line which empties into the pit in order to get a true sample. At that ~~to~~ time, they will pump out the pit to try to determine if there is something laying on the bottom of the pit which is causing the high pH. They should have an answer next week.

Sob  
C/23/81

CELLOMER CORP.

849160284

PERMIT TRANSMITTAL SHEET

# 20403700

COMPANY NAME

&  
ADDRESS

Cellomer Corp  
46 Albert Ave  
Newark

VOLUME

0.43 MGD

NO. OUTLETS

One

TYPE OF BUSINESS

mfg of alkyd resins and  
polymerized photo sensitive  
chemicals

NATURE OF DISCHARGE

High concentration of BOD

POTENTIAL PROBLEM AREAS

REMARKS

Louis Kaplan  
V.P.

849160271

FORM APPROVED  
OMB No. 158-R0100

FOR AGENCY USE									

## STANDARD FORM A-MUNICIPAL

## SECTION IV. INDUSTRIAL WASTE CONTRIBUTION TO MUNICIPAL SYSTEM

Submit a description of each major industrial facility discharging to the municipal system, using a separate Section IV for each facility description. Indicate the 4 digit Standard Industrial Classification (SIC) Code for the industry, the major product or raw material, the flow (in thousand gallons per day), and the characteristics of the wastewater discharged from the industrial facility into the municipal system. Consult Table III for standard measures of products or raw materials. (see instructions)

1. Major Contributing Facility  
(see instructions)

Name

401a

CELLOMER CORP.

Number &amp; Street

401b

46 ALBERT STREET

City

401c

NEWARK

County

401d

ESSEX

State

401e

NEW JERSEY

Zip Code

401f

07105

2. Primary Standard Industrial  
Classification Code (see  
instructions)

402

2821

3. Principal Product or Raw  
Material (see instructions)

Product

403a

ALKYD RESINS AND

PHOTO SENSITIVE CHEMICALS

Raw Material

403b

GLYCERINE, VEGETABLE OIL

ETHYLENE GLYCOL, SOLVENTS

ACIDS AND ACETONE

Quantity

Units (See  
Table III)

403c

403e

403d

403f

4. Flow Indicate the volume of water  
discharged into the municipal sys-  
tem in thousand gallons per day  
and whether this discharge is inter-  
mittent or continuous.

404a

16 thousand gallons per day

404b

☒ Intermittent (int) ☐ Continuous (con)5. Pretreatment Provided Indicate if  
pretreatment is provided prior to  
entering the municipal system

405

☐ Yes ☒ No6. Characteristics of Wastewater  
(see instructions)

Parameter Name	COLOR	TS	TSS	TURB.	CHLOR.	SULFATES	BOD	COD	TOC
406a Parameter Number	00100	00500	00530	00070	00940	00945	00310	00340	00680
406b Value	25	12170	20.5	2.5	150	24	2630	22300	10590
Hq									
71900									
.0005									

PASSAIC VALLEY SEWERAGE COMMISSIONERSY ~~XXXXX~~SEWER CONNECTION APPLICATIONApplicant is:  
Corporation XX  
Partnership \_\_\_\_\_  
Other \_\_\_\_\_PART I - SECTIONS A-CSECTION A: GENERAL INFORMATION

1. Company Name: CELLOMER CORPORATION
2. Location: 46 Albert Avenue  
Newark, New Jersey Zip Code: 07105
3. Mailing Address: As above  
Zip Code: \_\_\_\_\_  
Name, title, address and telephone number of person to contact concerning information provided in this application:
4. Name of Contact Official: Mr. Louis Kaplan  
Title: Vice President Phone No.: (201) 589-3875
5. Address: As above
6. Number of Employees - Full Time: 30 Part Time: N/A
7. Number of Work Days Per Week: 5  
Number of Shifts Per Day: 3  
Is production seasonal? No If so, explain: N/A
8. New Users Only: Indicate date user desires to commence operations:  
N/A
9. If property is owned, indicate Lot and Block Numbers: 29-2448  
November 25, 1980 Assessed Value: \$287,400.00
10. If property is rented, indicate name and address of Landlord:  
N/A

SECTION B: PRODUCT OR SERVICE INFORMATION

11. Brief description of manufacturing or other activity performed:  
This is a chemical plant manufacturing two main lines of products.  
Basically, the type of reactions carried out are those of  
esterification and polymerization.
12. Principal raw materials used: Phthalic anhydride, Glycerine,  
Pentaerythritol, Vegetable Oil, Ethylene Glycol, Mineral Spirits +  
Aromatic Solvents (xylol & toluol) sulfuric acid, chlorosulfonic ac  
acetone
13. Principal products or services: Manufacture of alkyd resins and  
polymerized photo sensitive chemicals.

849160273

## SECTION C: WATER DATA

14. Water Received: Year 19 (Report Volume in Gallons)

	PURCHASED	WELL	RIVER	TOTAL
1st Qtr. 1981	640,000 ft <sup>3</sup>	N/A	N/A	4,787,520 gal
2nd Qtr. 1980	822,100 ft <sup>3</sup>	N/A	N/A	6,149,719 gal
3rd Qtr. 1980	842,500 ft <sup>3</sup>	N/A	N/A	6,302,321 gal
4th Qtr. 1980	932,600 ft <sup>3</sup>	N/A	N/A	6,976,314 gal

2nd Qtr 80-1st Qtr. 1981  
19 GRAND TOTAL . . . . 24,215,875 gal.

NOTE: Cu. Ft. X 7.48 = Gallons

15. Name water supplier: City of Newark water Account#: 06-759-846 00016. Is well water metered? NA Is river water metered? NA17. Water Distribution: Year 19 80 (Report Volume in Gallons)

Use (List totals in gallons per year)

(a) sanitary sewer (include industrial & domestic)	20,410,375
(b) separate storm sewer, river, or ditch. . . . .	N/A
(c) contained in product . . . . .	NO
(d) evaporation. . . . .	3,800,000
(e) waste haulers. . . . .	5,500

Name, Address &amp; Registration Number of Waste Haulers Used

NJT000027821 All Country Environmental Service Corp. P.O. Box G, Glenwood, N.J.  
NJD058117979 BFI Waste Systems 714 Div. St., Elizabeth, N.J. 0720718. Is volume in 17 (a) measured? NO How? N/ACertification:

The information contained in Part I of this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

Name of Signing Official: Stanley P. EysmannTitle: President

Date

Signature

PART II - SECTIONS D-F

These sections must be completed if the Applicant:

- (a) discharges more than 25 000 gallons per day of either domestic and/or industrial wastes to the sanitary or combined sewer, or,
- (b) discharges toxic wastes or wastes which can have a significant impact on the PVSC treatment works.

Questions regarding the applicability of this form to your facility may be answered by contacting the Industrial Department of PVSC at 344-1800.

Company Name: CELLOMER CORPORATION

Location: 46 Albert Avenue, Newark, New Jersey 07105

SECTION D: OPERATIONAL CHARACTERISTICS

19. Discharge of industrial waste is continuous \_\_\_\_\_ or intermittent XX
20. Discharge of industrial waste occurs between the following hours: 24 Hrs.
- \_\_\_\_\_
21. Industrial Waste is, or may be discharged:
- (a) only to the sanitary (or combined) sewer XX
  - (b) to both the sanitary (or combined) sewer  
and a separate storm sewer, river or ditch N/A
  - (c) NPDES Permit Number N/A
22. Describe seasonal variations, if any, giving dates, volumes, rates, hours, etc.  
Include variations in product lines which affect waste characteristics.  
NONE
- \_\_\_\_\_
- \_\_\_\_\_
23. Describe any pretreatment process in use: Neutralization of  
inorganic acids with sodium hydroxide solution.
- \_\_\_\_\_
- \_\_\_\_\_

24. Describe any treatment process applied to raw water taken into the plant:

None except for water softener used for water treatment of  
boiler feedwater makeup.

25. Describe any processes used to recycle water: Utilizing a Marley,  
Single Cell, Cross. Flow Cooling Tower Model 8807P circulating  
at 500 GPM with 15°F.Δt

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

SECTION E: SEWER CONNECTION INFORMATION

26.

OUTLET * NUMBER	SEWER SIZE (INCHES)	DAILY FLOW (GALLONS)	CONTAINS INDUSTRIAL WASTE (YES OR NO)
	8"	8,640	yes

See lot  
3/27

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

Attach a plot plan of the property, showing:

- (a) all existing or proposed sewer and drain lines (including outlets to a storm sewer, river or ditch);
- (b) sample point(s);
- (c) details of the connection(s) to the municipal (or PVSC) sewer, including the distance and direction of each connection from the nearest street intersection.

\*If only one outlet, leave blank.

Number multiple outlets starting with 1.

849160276



# SECTION F: ANALYSIS OF INDUSTRIAL WASTE

27. Analysis listed below is based on a composite sample of industrial waste taken from the following outlets listed in Section E:

## ONLY ONE OUTLET ----= NO AVERAGING

(See instructions for proportioning samples from more than one outlet)

28. Analytical Data: Concentration values are to be reported in mg/l (ppm) unless specified otherwise; analyze waste for those parameters marked with an asterisk (\*), analyze waste for other parameters reasonably expected to be present. Code numbers are for internal use only.

REPORT TO THE NEAREST UNIT: X (EXAMPLE: 150 mg/l)		
CODE	PARAMETER	VALUE
* 0100	Color (Apha Units)	25
0200	Radioactivity (PL-1)	--
* 0500	Total Solids	12,170mg/L
* 0505	Total Volatile Solids	11,577mg/L
* 0510	Total Mineral Solids	593 mg/L
* 0530	Total Suspended Solids	7 mg/L
* 0540	Volatile Suspended Solids	7 mg/L
* 0550	Mineral Suspended Solids	Nil
* 0070	Turbidity (JTU)	2.5 (NTU)
0550	Emulsified Oil or Grease	
* 0940	Chlorides	160 mg/L
* 0945	Sulfates	24 mg/L
* 0310	Biochemical Oxygen Demand (BOD)	4,150mg/L
* 0340	Chemical Oxygen Demand (COD)	22,300mg/L
* 0680	Total Organic Carbon (TOC)	10,590mg/L

REPORT TO THE NEAREST TENTH: 0.X (EXAMPLE 1.6 mg/l)		
CODE	PARAMETER	VALUE
0745	Sulfide	
0740	Sulfite	
8260	Surfactants (MBAS)	
* 9000	pH (standard units) (range)	2.66*
0625	Kjeldahl N as N	
0610	Ammonia as N	
0620	Nitrate as N	
0615	Nitrite as N	
0507	Ortho Phosphates as P	

\*Due to organic acids

849160277

REPORT TO THE NEAREST HUNDREDTH: 0.XX  
(EXCEPT WHERE INDICATED)  
(EXAMPLE: 0.36 mg/l)

CODE	PARAMETER	VALUE
1097	Antimony (Sb)	
1002	Arsenic (As)	
1022	Boron (B)	
1027	Cadmium (Cd)	
1034	Chromium Total (Cr)	
1042	Copper (Cu)	
1045	Iron (Fe)	
1051	Lead (Pb)	

REPORT TO THE NEAREST HUNDREDTH: 0.XX  
(EXCEPT WHERE INDICATED)  
(EXAMPLE: 0.36 mg/l)

CODE	PARAMETER	VALUE
* 1900	(Report to Mercury 0.XXX)	Less than 0.0005mg/L
1067	Nickel (Ni)	
1147	Selenium (Se)	
1077	Silver (Ag)	
1102	Tin (Sn)	
1092	Zinc (Zn)	
4053	(Report to Pesticides 0.XXX)	
2730	Phenol	

29. Samples collected by: CELLOMER CORPORATION Date: February 2, 1981

Keegan Technology &  
30. Samples analyzed by: Testing Associates Date: 2/19/81

Products being manufactured when sample was collected: Alkyd Resins

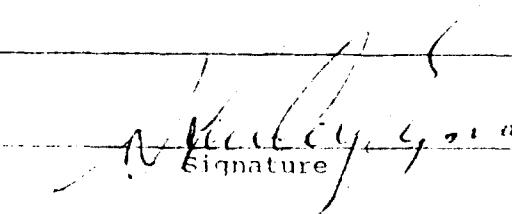
Certification:

The information contained in Part II of this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete, and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

31. Name of Signing Official: STANLEY P. EYSMANN

Title: PRESIDENT

Date: \_\_\_\_\_ Signature: 

# SECTION F: ANALYSIS OF INDUSTRIAL WASTE

27. Analysis listed below is based on a composite sample of industrial waste taken from the following outlets listed in Section E:

(See instructions for proportioning samples from more than one outlet)

28. Analytical Data: Concentration values are to be reported in mg/l (ppm) unless specified otherwise; analyze waste for those parameters marked with an asterisk (\*), analyze waste for other parameters reasonably expected to be present. Code numbers are for internal use only.

REPORT TO THE NEAREST UNIT: X (EXAMPLE: 150 mg/l)		
CODE	PARAMETER	VALUE
* 0100	Color (Apha Units)	25
0200	Radioactivity (PL-1)	-
* 0500	Total Solids	12,170 mg/L
* 0505	Total Volatile Solids	11,577 mg/L
* 0510	Total Mineral Solids	593 mg/L
* 0530	Total Suspended Solids	7 mg/L
* 0540	Volatile Suspended Solids	7 mg/L
* 0550	Mineral Suspended Solids	Nil
* 0070	Turbidity (JTU)	2.5 (NTU)
0550	Emulsified Oil or Grease	-
* 0940	Chlorides	160 mg/L
* 0945	Sulfates	24 mg/L
* 0310	Biochemical Oxygen Demand (BOD)	4150 mg/L
* 0340	Chemical Oxygen Demand (COD)	22,300 mg/L
* 0650	Total Organic Carbon (TOC)	10,590 mg/L

REPORT TO THE NEAREST TENTH: 0.X (EXAMPLE 1.6 mg/l)		
CODE	PARAMETER	VALUE
0745	Sulfide	
0740	Sulfite	
8260	Surfactants (MBAS)	
* 9000	pH (standard units) (range)	2.66 *
0625	Kjeldahl N as N	
0610	Ammonia as N	
0620	Nitrate as N	
0615	Nitrite as N	
0507	Ortho Phosphates as P	

\* due to organic acids.

REPORT TO THE NEAREST HUNDREDTH: 0.XX (EXCEPT WHERE INDICATED) (EXAMPLE: 0.36 mg/l)		
CODE	PARAMETER	VALUE
1097	Antimony (Sb)	
1002	Arsenic (As)	
1022	Boron (B)	
1027	Cadmium (Cd)	
1034	Chromium Total (Cr)	
1042	Copper (Cu)	
1045	Iron (Fe)	
1051	Lead (Pb)	

REPORT TO THE NEAREST HUNDREDTH: 0.XX (EXCEPT WHERE INDICATED) (EXAMPLE: 0.36 mg/l)		
CODE	PARAMETER	VALUE
*1900	(Report to Mercury 0.XXX)	less than .0005 mg/L
1067	Nickel (Ni)	
1147	Selenium (Se)	
1077	Silver (Ag)	
1102	Tin (Sn)	
1092	Zinc (Zn)	
4053	(Report to Pesticides 0.XXX)	
2730	Phenol	

29. Samples collected by: Client Date: \_\_\_\_\_  
 30. Samples analyzed by: Keegan Technology & Testing Associates, Inc. Date: 2-19-81

Products being manufactured when sample was collected: \_\_\_\_\_

Attestation:

- information contained in Part II of this application is familiar to me and, to best of my knowledge and belief, such information is true, complete, and accurate.
- the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

31. Name of Signing Official: STANLEY P. EYSMANN

Title: President

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

MANUFACTURES BRANCH CENTRAL R.R. OF N.J.

CELLOMER CORP.  
NEWARK, N.J.  
DEC. 1980  
MAIN

ANNEX

#2

#3

#4

#5

8" DIA. SEWER LINE

24"x24" SAMPLE POINT

N 12° 36' W 523.26'

170' - 0"

CORNELIA

STREET

849160281

PASSAIC VALLEY SEWERAGE COMMISSIONERS

SEWER CONNECTION APPLICATION

PART I - SECTIONS A-C

SECTION A: GENERAL INFORMATION

Renewal Application

Y or N

Applicant is:  
Corporation ☒  
Partnership ☐  
Other ☐

1. Company Name: Cellomer Corporation
2. Location: 46 Albert Avenue  
Newark, New Jersey Zip Code: 07105
3. Mailing Address: As above  
Zip Code: \_\_\_\_\_  
Name, title, address and telephone number of person to contact concerning information provided in this application:  
4. Name of Contact Official: Mr. Louis Kaplan  
Title: Vice President Phone No.: 201-589-3875
5. Address: As above
6. Number of Employees - Full Time: 30 Part Time: \_\_\_\_\_
7. Number of Work Days Per Week: 5  
Number of Shifts Per Day: 3  
Is production seasonal? No If so, explain: \_\_\_\_\_
8. New Users Only: Indicate date user desires to commence operations:  
NA
9. If property is owned, indicate Lot and Block Numbers: 29-2448  
Nov. 25 19 80 Assessed Value: \$287,400.00
10. If property is rented, indicate name and address of Landlord:  
NA

SECTION B: PRODUCT OR SERVICE INFORMATION

11. Brief description of manufacturing or other activity performed:  
This is a chemical plant manufacturing 2 main lines of products.  
Basically, the type of reactions carried out are those of esterification  
and polymerization.
12. Principal raw materials used: Phthallic anhydride, Glycerine -  
Pentaerythritol - Vegetable Oils - Ethylene Glycol, Mineral Spirits + Aromatic  
Solvents (xylol and toluol) sulfuric acid, chlorosulfonic acid, acetone
13. Principal products or services: Manufacture of alkyd resins and  
polymerized photo sensitive chemicals.

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SECTION C: WATER DATA

14. Water Received: Year 19 (Report Volume in Gallons)

	PURCHASED	WELL	RIVER	TOTAL
1st Qtr. 11/6/78-2/5/79	702,000 Ft <sup>3</sup>	NA	NA	
2nd Qtr. 2/6 → 5/7	432,200 "	"	"	
3rd Qtr. 5/7 → 8/9	397,400 "	"	"	
4th Qtr. 8/9 → 11/5	549,900 "	"	"	

19 79 GRAND TOTAL . . . . 2,061,500 cu. ft.

NOTE: Cu. Ft. X 7.48 = Gallons 15,570,000 gal.

15. Name water supplier: City of Newark water Account# 06-759-846 000

16. Is well water metered? NA Is river water metered? NA

17. Water Distribution: Year 19 79 <sup>15,570,000</sup> (Report Volume in Gallons)

Use (List totals in gallons per year)

- (a) sanitary sewer (include industrial & domestic) 6,570,000
- (b) separate storm sewer, river, or ditch. . . . . NA
- (c) contained in product . . . . . NO
- (d) evaporation. . . . . 9,000,000
- (e) waste haulers. . . . . 5,500

Name, Address & Registration Number of Waste Haulers Used  
 NJT000027821 All Country Environmental Service Corpn. P.O. Box G, Glenwood, N.J. 07418  
 NJD058117979 BFI Waste Systems 714 Div. St. Elizabeth, N.J. 07207

18. Is volume in 17 (a) measured? No How? --

Certification:

The information contained in Part I of this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

Name of Signing Official: Stanley Eysmann

Title: President

1/17/81  
Date

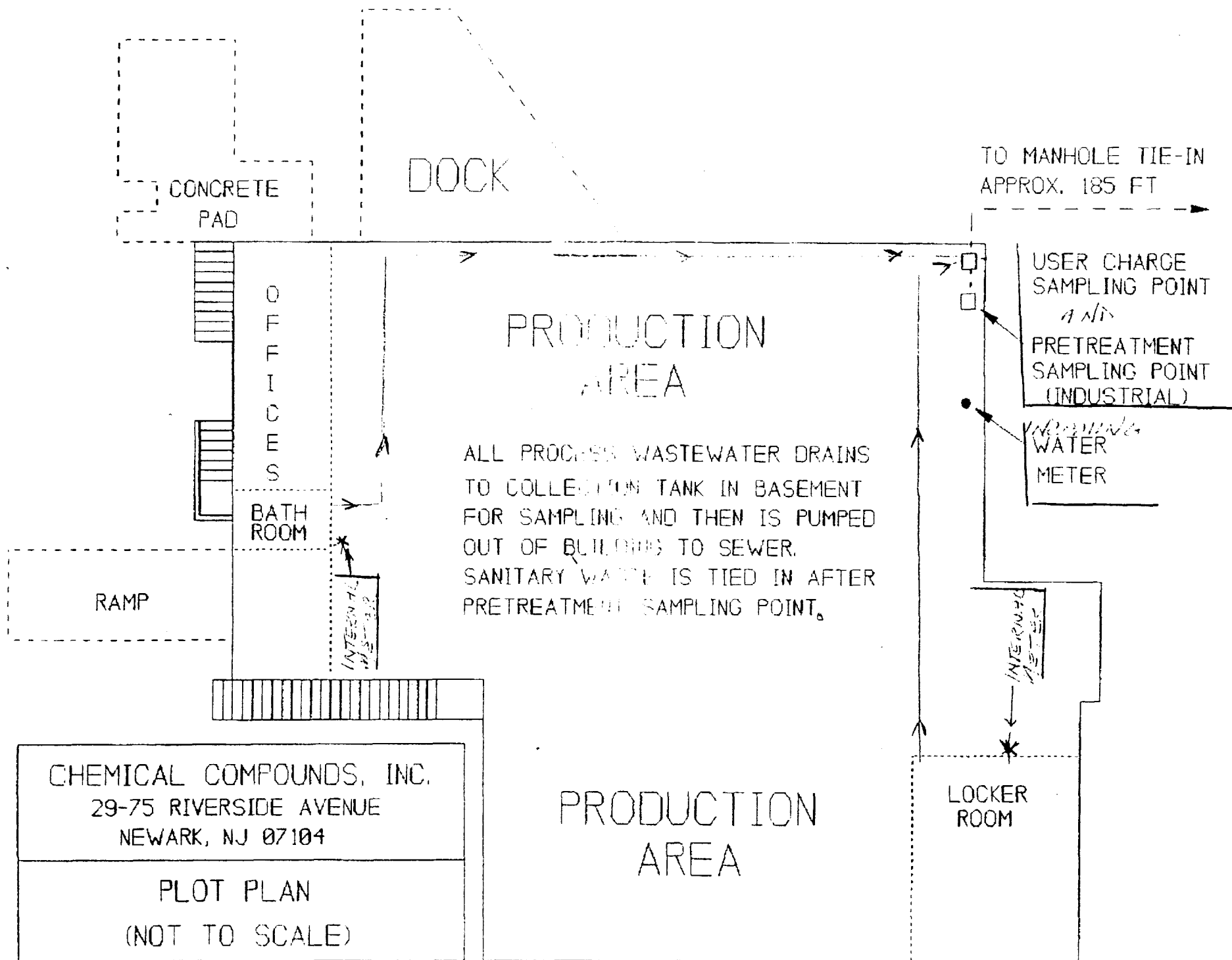
Stanley Eysmann  
Signature

CHEMICALS COMPOUNDS, INC.

849160334



849160285



Attendees: J. Ambrosio - PVSC Counsel

849160286

A. Caltagirone - PVSC

S. Geller - Chem Comp Counsel

J. Sabo - " " Consultant

A. Celleri - " " President

3/10/95

Chemical Compounds - dye manufacturer (414)

- Back in 10,000 gal tank and release amount of 3500 gpd
- Replaced equipment + elim some sources of  $Pb$ ,  $Zn$ , +  $CN$ , which were problematic.
- $CN$  showing up due to interferences. Have retained NHT to investigate. Sulfide interferences suspected.
- While research is going on, INF-1  $CN$  is still being done by a certified lab.
- As mentioned, after the talked about chlorinating the compound, that this would give a  $CN(A)$  result, when they are regulated for  $CN(T)$ . They said the  $Cl_2$  is only being added to research the problem; they're using ISE method.
- They said no way it's in raw material, or synergistically being formed.
- They stated that it is going to take NHT some time to come up with a solution. They want to comply + believe they are, but the sample result is coming up high.
- They bought an AA + have hired someone full time to find the source. All raw materials are being checked.
- \* They want to extend compliance sched for 12 mo (from 4/1/95 to 4/1/96) for  $CN$ ,  $Pb$ , +  $Zn$ .  
We will continue to write NOV as needed.
- JA asked for a letter updating the issues, so that we can amend permit. Force Majeur not really applicable.
- Co gave handouts showing effort + expenditure to date.
- TCO (pg 5, no. 7) says that P/T upgrades constitute any permit during TCO period. When JA rec's letter, he'll send to PVSC for comment.

## Cyanide History

Date	Source	PPM MAX = 0.42	Water Consumption	Grams/Day MAX = 4.44
3/2/95	Same Sample as on 3/1, but this time to prevent nitrate interferences, we added sulfamic acid.	0.189		
3/1/95	10,000 gallon wastewater tank sample which contained 2 batches of NIINFA ML's, split w/ J. Sabo who sent samples to two other labs. (Once again, the absorbing NaOH solution appeared yellow and I suspected interferences, we checked the sample for sulfate/sulfites and oxidizing agents and it proved negative. But we don't have a way to test for nitrates and nitrites and NIINFA contains nitro-groups, therefore we are not confident in this result.	0.243		
2/13/95	HC Blue No. 2, Batch #152, same batch that we did lab filtration, so we sampled a 5 gallon pail for cyanide treatment studies.	0.24		
2/10/95	HC BLUE No. 2 ML's (In process, lab filtration to obtain mother liquors)	0.451		
2/7/95	February Monthly Wastewater Sample split with Chemtech for PVSC monthly. Performed a second time with a less vigorous boil, a more controlled vacuum, etc. (sample did not show as much color in NaOH soln.) <b>CHEMTECH RESULTS: 0.876 PPM</b>	0.059		
2/7/95	February Monthly Wastewater Sample split with chemtech for PVSC Monthly. (NaOH solution showed color upon distillation and suspected an interference, suspected cyanide stream was not part of this sample)	0.48		
2/2/95	4th attempt to prove accuracy of Cyanide Analysis, This time for a smaller concentration of 0.32 ppm. (Results Succeeded)	0.32 ppm		
2/1/95	3rd attempt to prove accuracy of Cyanide Analysis but this time using a 10 ppm solution which would be diluted to various dilutions and evaluated utilizing the dilution factors. (Results Succeeded)	10ppm		
1/27/95	2nd attempt to prove accuracy of Cyanide analysis using a 0.3ppm solution. (Results Failed Again)	0.22		
1/26/95	Prepared 0.3ppm solution to test accuracy of Cyanide Analysis. (Results Failed)	0.21		
1/21/95	Wasttank Sample Split w/ PVSC representative who visited the plant to sample for cyanide in 2 bottles on 1/19	0.06		
1/20/95	NDAPA Mother liquors of Batch #237, Split the sample w/ Chemtech for full analysis: Chemtech Results: TCN = 1.695ppm, Pb: 1.85 ppm, Zn: 2.09	0.12		

849160287

1/17/95	HC Blue ML's of Batch #148 Treated for Cyanide in the Plant	.014		
1/17/95	HC Blue ML's of Batch #148	0		
1/12/95	HC Blue ML's of Batch #146	0.155ppb		
1/12/95	Caustic Soda Solution from Scrubber	0.116ppb		
1/11/95	HC Blue ML's of Batch #145	0.476ppb		
1/11/95	HC Blue ML's of Batch #144	0.596ppb		
1/10/95	Wastewater Monthly Compliance, split sample with PVSC	0.0		
1/9/95	HC Blue ML's of Batch #140 utilizing adjusted standard scale into micro grams cyanide(George's result on the same sample)	0.06 (George: 0.23)		
1/6/95	***Treated HC Blue ML's of Batch #140, (Adjusted pH to 5.72, Added 6 mL of NaHypoCl, adjust pH to 9.5, add 4 mL NaHypoCl, (Curve in mg Cyanide)	0.092 (George: 0.34)		
1/4/95	HC Blue ML's of Batch #141(Chemtech Analysis)	0.05		
1/3/95	***HC Blue ML's of Batch #140, First attempt at the cyanide analysis. Standard Curve in mg Cyanide.	0.02		
12/30/94	***HC Blue ML's of 12/30/94(Batch#140) George's Example Analysis (using mg cyanide on standard curve, didn't use the proper standard range, but I used the absorbance results and applied to a different standard curve***	0.064		
12/14/94	Wastewater, Monthly Compliance	.447	3320	5.617
12/06/94	HC Blue ML's after Cyanide Treatment #2	1.67	3320	20.99
11/07/94	Wastewater, Monthly Compliance	.257	3532	3.44
			Gallons/Day	
10/10/94	HC Blue ML's after Cyanide Treatment#1	0.47	4596	8.18
09/13/94	Wastewater, Monthly Compliance	0.03	3556	0.404
8/31/94	Wastewater, Monthly Compliance	0.05	5217	0.987
8/30/94	Wastewater Tank	0.17	5217	3.36
8/30/94	NHNFA Mother Liquors	0.038	5217	0.750
8/30/94	HC Blue Mother Liquors	2.0	5217	39.49
8/10/94	NHNFA Mother Liquors	0.03	5217	0.592
8/05/94	Wastewater, Monthly Compliance	1.65	5217	32.58
7/06/94	Wastewater, Monthly Compliance	0.14	5022	2.66
6/06/94	Wastewater, Monthly Compliance	0.14	4377	2.32
5/31/94	Wastewater ReSample	0.14	3968	2.10
5/29/94	Wastewater Resample	0.46	3968	6.90
5/10/94	Wastewater, Monthly Compliance	0.40	3968	6.00
4/11/94	Wastewater, Monthly Compliance	0.43	4266	6.94
3/11/94	Wastewater, Monthly Compliance	0.08	6530	1.98
2/10/94	Wastewater, Monthly Compliance	0.06	3050	0.693
1/10/94	Wastewater, Monthly Compliance	0.71	2214	5.95
12/09/93	Wastewater, Monthly Compliance	0.44	1712	2.85
11/09/93	Wastewater, Monthly Compliance	0.08	2926	0.866
10/12/93	Wastewater, Monthly Compliance	1.18	2427	10.84
9/21/93	Wastewater, Monthly Compliance	0.13	3054	1.50
8/20/93	Wastewater, Monthly Compliance	0.03	2658	0.302

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## NOTES ON ZINC PROJECT

2/14/95: Tuesday: Sampled basement wastetank, after solids removal. After every sample I take of the wastetank, I am pumping the waste to the Methanol tank for storage. After this sample, I pumped the waste over to the tank. This sample had a concentration of 2.83 ppm. I also sample the drum full of the waste solids and water from the cleaning, but Sonia couldn't analyze solids, she noted that there was magnetic metals in the waste that attached to the magnetic stirrer. She also noted that there were oily layers in the waste. These components must be from the mechanics workshop.

2/16/95: Thursday: Sampled basement wastetank, and the basement sump. On this day the concentrations resulted respectively as follows, 0.5943 ppm, and 0.6164 ppm. Small concentrations of zinc can add up in the waste tank. I disconnected the sump pump in the basement to accumulate the water and then resample so that I can determine if the basement is primary source of zinc or not. And if so, where is it coming from?

2/17/95: Friday: Sampled the Scrubber Solution: (0.423ppm), basement tank(1.464ppm), 10,000 gal waste tank(0.612ppm), Cooling Tower(0.5796ppm), Blue ML's (0.474 ppm). The following actions were taken on Saturday. The floors were acid cleaned, and the waste was pumped directly out. The scrubber solution was disposed of. On Saturday, Carlos disposed of the waste ML's from the 10,000 gal tank.

2/21/95: Tuesday: This morning the guys were pumping out the cooling water tank and cleaning out all the rust and solids that accumulated. They refilled with new water. They also pumped out the caustic scrubber solution and made a new one. I sampled the basement sump which was full this morning, and I also sampled the basement tank which was also full. After sampling, I pumped out the tank and the sump to the MeOH tank. 10,000 gal tank is empty with solids on the bottom this morning. Today, Yellow No. 4 ML's should be produced. I told Carlos to give me a 5 gallon sample for full analysis. Results: Basement Sump: 3.55 ppm and Basement Tank: 6.1 ppm (Source must have been from the acid cleaning of the floors) As for the sump, some thing from the basement must contain zinc.

2/22/95: Wednesday: This morning I unplugged the basement sump pump again. I sampled the basement tank, (which probably contains alot of floor contamination because of ongoing acid floor cleaning): May get some main floor contaminants in basement sump because of disconnected drain. I also sampled the 10,000 gal. wastetank which contains only NOPD rework washes. The Methanol tank was completely filled today so we sampled and pumped the tank out about 4000 Gallons of accumulated floor drain water. I also sampled Beta Naphthol for Zinc because it is one of the most spilled chemicals on the floors and it is organic and therefore probably isn't pure. I also sampled NFA which is the main solid raw material for BDN. Basement floor was cleaned today. Sump was cleaned out and pump cleaned also. Sampled BDN wet cake to see if zinc is in cake. Today will end the acid floor cleaning. I gave Sonia a sample of NOPD wet cake to run zinc tomorrow.

Results: Basement Tank: 7.8ppm and Methanol Tank: 3.142ppm: Beta Naphthol, NFA(chinese and american), and the 10,000 gal wastetank had less than 0.5 ppm Zinc.

2/23/95: Thursday: Last night, Byron collected HC Yellow No. 4 Mother Liquors into the blue mixing tank. I have a pail of sample that I will send out to a different lab than ChemTech. Voas and SVoAs will be performed. Today Sonia will analyze the NOPD wet cake, basement tank, and Yellow No. 4 for Cyanide, Lead and Zinc. During the filtration of the second part of Batch #10 of Yellow No. 4, lines were having problems, so there was yellow #4 ML contamination on the floor. 10,000 gallon tank contains some yellow No. 4 ML's also because mixing tank became full. Results: NOPD wet cake appears to have less than 0.2 ppm zinc.

HC Yellow No. 4 ML's contain 1.825 ppm zinc.

Basement Tank: 4.515 ppm zinc

849160289

I sampled the basement tank again at the end of the day to see if any more zinc accumulated because of the vigorous floor washings that took place today. Sonia will analyze it tomorrow.

\*The zinc from the Yellow No. 4 ML's can be coming from the 5-nitro-2-amino phenol, or the 2-chloroethanol, or the caustic solution. Tomorrow we will sample the 5-nitro-2-amino and the chloroethanol.

As for the continuing zinc in the basement tank, we will continue to clean the floors until no zinc is present for consecutive days.

The cyanide analysis performed on the yellow was not completed because the standard curve was wrong. However when the samples absorbance was measured, no cyanide would be present on any curve. Therefore it is a good assumption that there is no cyanide in yellow mother liquors.

2/24/95: Friday: Sonia is analyzing the 5-nitro-2-amino phenol and the ECH for zinc. This could be the source of zinc in the Yellow ML's. The amino phenol sample is from the lab from a long time ago and is not representative of the raw that was used in the production of yellow. Sonia is also analyzing a basement tank sample that was taken at around 4:30 pm yesterday, which will show how much zinc accumulated during yesterday's production. The 10,000 gal tank is almost full now and it contains, NOPD rework water, HC Yellow #4 ML's, and reactor washes. The only expected source of zinc should come from the yellow. We will conduct an analysis on the 10,000 gal tank today. We will also analyze the accumulated floor washings from last night and this morning in the basement tank. I disconnected the sump again to see if any zinc is coming from the basement floor. Therefore we are looking for the following results today:

- 1) Basement Tank from 4:30pm on 2/23: 5.483 ppm
- 2) 5-Nitro 2-Amino Phenol: No Results
- 3) Ethylene Chlorohydrin: 8.0 ppb
- 4) Basement Tank from 11:30am on 2/24: 3.91 ppm
- 5) Basement Sump :2/24: 2.15 ppm
- 6) 10,000 Gal Tank: (NOPD rework, reactor wash, and Yellow4): .456 ppm

2/27/95: Monday: On Saturday, the basement drainage system and floors were cleaned. All of the solids that accumulated in the drains were collected for disposal. I disconnected the sump pump again to see if the basement is giving zinc. I will sample the sump when it is full and the basement tank also. So far, the mother liquors of the products don't seem to be the source of zinc. The floors, tanks, spills of raws, may be the only source. I will continue to sample the 10,000 gal tank separate product ML's.  
Results: 10,000 gal tank: 4.420 ppm, Basement Tank: 4.436, Sump: no zinc detected, DNHA ML's: no zinc detected.

2/28/95: Tuesday: The results of the 10,000 gal tank were not pleasing and confusing. Where could the zinc be coming from in the tank. I will resample today. The following raws were requested to be sampled: Blanc Fixe for zinc, and OLIN NFA for zinc, lead, iron, and cyanide.  
I will also sample the basement tank today.

3/1/95: Wednesday: Sampled the Methanol Tank and then discharged it. Sampled the 10,000 gal tank which contained mostly NHNFA mother liquors, and I sampled the sump and the basement tank.  
Methanol Tank: 1.155 ppm, 10,000 gal.: .2512 ppm, Sump: 1.061 ppm, Basement Tank: 1.593 ppm.

3/2/95: Thursday: Sampled the basement tank and the sump.  
Basement Tank: 0.8598 ppm, Sump: 1.06 ppm

849160290

3/3/95: Friday: Reactor B, which contained NPD was being washed by Pedro onto the floor and into the basement tank. Sump sample and basement sample.

I took a sample from the ammonia scrubber for cyanide and zinc.

Sump: 0.6042 ppm, Basement Tank: 1.053ppm

3/6/95: Monday: On Saturday the 10,000 gal tank was emptied. Today, NHNFA (batch #) is being pumped into the 10,000 gal tank. The mixing tank should contain yellow #2 ML's, and the drain tank is partially empty. The basement tank zinc levels have fluctuated and therefore need to be sampled continuously while studying plant operations. The sump zinc levels have decreased but still need sampling. The 10,000 gal tank needs sampling upon addition of new mother liquors. HC yellow No. 2 need a full analysis. I sampled the 10,000 gal tank, the basement tank, and the ammonia scrubber solution for zinc.

Results: 10,000 gal. tank: <0.07 ; Ammonia Scrubber solution: <0.0

Basement Tank: 5.206

\*\* The absorbances read for the ammonia scrubber solution came out negative. This is not supposed to happen. How do we prevent this from happening?

3/7/95: Tuesday: Experimenting with the yellow 2 batch, added more water to dilute the ml's and separate the xylene layer and also dissolve any solids. I resampled and the samples contain a xylene layer. This stream will most likely have to pass through the carbon filtration system to remove xylene. I also sampled and discharged the Drain Tank. I am sampling the sump and the basement tank. I began collection at around 12:00 pm and will accumulate sump water and drain water for sampling. Plant Activities: The sump and basement tank did not accumulate by 5:00 so I left the sampling for Wednesday.

Drain Tank:

3/8/95: Wednesday: First thing in the morning, I sampled the basement tank, which was overflowing. And I sampled the sump which was just about full. As usual, I pumped the waste to the drain tank and began collection again at 11:00 am.

849160291

DANIEL F. BECHT, ESQ.  
CHAIRMAN

THOMAS J. CIFELLI  
VICE CHAIRMAN

DOMINIC W. CUCCINELLO  
RONALD W. GIACONIA  
JAMES KRONE  
RAYMOND LUCHKO  
FRANK ORECHIO  
DONALD TUCKER  
COMMISSIONERS

**Passaic Valley  
Sewerage Commissioners**

600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

ROBERT J. DAVENPORT  
EXECUTIVE DIRECTOR

PETER G. SHERIDAN  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

February 9, 1995✓

Mr. Alberto Celleri  
Chemical Compounds, Inc.  
29-75 Riverside Avenue  
Newark, New Jersey 07104

Certified Mail  
P 258 625 759

**RE: NOTICE OF VIOLATION**

**PERMIT #: 20407122**

**VIOLATION DATE: DECEMBER, 1994**

**SECTION VIOLATED: 40 CFR 414**

**SNC-ZINC**

**SNC- TOLUENE**

**SNC-ETHYLBENZENE**

**SV-CYANIDE**

Dear Mr. Celleri:

You are put on notice that your company is in violation of Federal Regulation 40 CFR 414 and Section 313.1 of the PVSC Rules and Regulations. A review of your MR-1 for December, 1994 revealed the following mass limit exceedances:

A sample for zinc taken by your company on 12/14/94 resulted in a mass loading of 29.03672 g/day, exceeding the daily maximum limit of 27.60502 g/day. Additionally, it exceeded the monthly average limit of 11.10547 g/day, by more than 20%.

A sample for cyanide taken by your company on 12/14/94 resulted in a mass loading of 5.58494 g/day. This exceeded the monthly average limit of 4.44219 g/day, by more than 20%.

A sample for toluene taken by your company on 12/14/94 resulted in a mass loading of 5.74737 g/day, exceeding the daily maximum limit of 0.78267 g/day. Additionally, it exceeded the monthly average limit of 0.29615 g/day, by more than 20%.

**849160292**



**RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS, INC.**

February 9, 1995

Page 2

A sample for 2-nitrophenol taken by your company on 12/14/94 resulted in a mass loading of 0.74966 g/day. This exceeded the monthly average limit of 0.68748 g/day.

A sample for ethylbenzene taken by your company on 12/14/94 resulted in a mass loading of 2.99863 g/day. This exceeded the monthly average limit of 1.50188 g/day, by more than 20%.

You should be aware that a monthly average of all samples taken either by you or PVSC that is 20% or more above the monthly average limitation for a hazardous pollutant makes the violation a serious violation and that two (2) serious violations in any six month period would make a company a Significant Non Complier (SNC). In addition, four monthly average violations of any amount in any six month period would also make a company SNC. This would subject your company to mandatory minimum fines under the Clean Water Enforcement Act (CWEA). Based upon the explanation given above, your company has committed its third serious violation for zinc in a six month period (following those in August and November), as a defined by the Clean Water Enforcement Act, making your company SNC for this parameter. Chemical Compounds is also SNC for toluene and ethylbenzene. There was also a serious violation for cyanide.

This will also confirm that Chemical Compounds is operating pursuant to the terms and conditions of a Judicial Consent Order. The compliance date for lead, zinc and cyanide is no later than 04/01/95. Accordingly, so long as you adhere to the compliance schedule and other conditions set forth in the JCO, Chemical Compounds will not be subject to additional enforcement action or civil penalties for having violated the lead, zinc, and cyanide limitations of its permit. Toluene and ethylbenzene are not included in the JCO and are subject to additional enforcement action. In view of these violations a copy of this letter is being forwarded to the PVSC attorney.

**849160293**

**RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS, INC.**

February 9, 1995

Page 3

If you have any questions please call Andy Caltagirone at (201) 817-5723.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

A handwritten signature in dark ink, appearing to read "Robert J. Davenport", is written over a horizontal line.

Robert J. Davenport  
Executive Director

RJD/mc

cc: Frank P. D'Ascensio  
Gabriel M. Ambrosio, Esq.  
City of Newark  
Carmen DellaPia

**849160294**

# CHEMICAL COMPOUNDS, INC.

Riverdale Industrial Park

29-25 Riverdale Avenue • Riverdale, New York

8001 105 2411 • FAX 8001 105 19

MGR (FD)	
RIVER (FC)	
OPS (TM)	
MONIT (MG)	YAE
LAB (AM)	

## FOURTH INTERIM COMPLIANCE REPORT

As per our Consent Order and Final Judgement, herein we provide our Fourth Interim Compliance Report which outlines the steps Chemical Compounds has taken to try and achieve compliance with discharge limitations of 40 CFR 414.

1. Chemical Compounds continues classifying and categorizing the variety of products manufactured at the facility. This continues to be a slow process as the wastewater from these products cannot be analyzed for potential problems until these compounds are produced and production is dependent upon the request and scheduling of customer orders. We now keep a daily summary of all of our sampling and research activities related to finding the sources of our problems.

2. Chemical Compounds continues to have problems in finding a treatment for what appears to be a complex cyanide compound which occurs occasionally in our wastewater and may be presenting interference problems for standard cyanide analytical methods. Our consultant, Hampton & Clarke, informed us that known treatment methods were not working and in some cases seemed to increase the concentration of cyanide in the sample after treatment. They are looking into a new E.P.A. analytical method which detects cyanide without interferences and may give us more information about our apparent problem. They are also looking into a high temperature treatment method to see if it could be a potential treatment for our wastewater.

3. Chemical Compounds has entered into an agreement with the New Jersey Institute of Technology Hazardous and Toxic Chemicals Environmental Lab to assist us in our overall efforts. NJIT offers their research and technical staff facilities to private companies.

4. Chemical Compounds has obtained a carbon filtration system to be put on line for filtering floor washing wastewater which may contain some volatile compounds. Floor washing wastestreams have been segregated to a separate holding tank for this treatment.

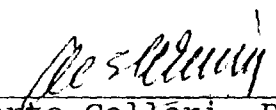
849160295

CHEMICAL COMPOUNDS, INC.  
Interim Compliance Report

Pg. 2/2

5. Based upon our efforts to date, Chemical Compounds believes that full control and elimination of potential sources of Lead, Zinc and Cyanide has not yet been achieved and that the possibility still exists for exceedences of our 40 CFR 414 Mass Limits used for compliance. Analytical results continue to fluctuated tremendously indicating that a problem still exists. Therefore, Chemical Compounds will continue our efforts with the assistance of our environmental consultants. We will be requesting an extension of our compliance date past April 1, 1995.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system, designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

  
Alberto Celleri, President

3/9/95  
Date

849160296

**CHEMICAL COMPOUNDS, INC.**

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

March 3, 1995

Sudhi Mekherjee  
New Jersey Institute of Technology  
Environmental Engineering Lab  
Newark, NJ 07102

Dear Sudhi:

Chemical Compounds Inc. agrees to the terms specified in your letter of proposal. We will pay \$1,650.00 for the analysis of Total Cyanide by titrimetric, colorimetric and ion selective-electrode methods upon submittal of the analytical report. Thank you for your assistance in our efforts to comply with the wastewater discharge regulations.

Sincerely,

Arturo Celleri

Cc: Alberto Celleri

849160297



A Public  
Research University

NEWARK COLLEGE OF ENGINEERING  
DEPARTMENT OF CIVIL AND  
ENVIRONMENTAL ENGINEERING

Tel: (201) 596 2477  
Fax: (201) 242 1823

March 3, 1995

Mr. Arturo Celleri  
Chemical Compounds, Inc.  
29-75 Riverside Ave.  
Newark, NJ 07104



CHEMICAL COMPOUNDS, INC.

Alberto Celleri  
President

29-75 Riverside Avenue  
Newark, NJ 07104

201-242-1823  
Fax # 201-242-1823

Dear Mr. Celleri:

Thank you for showing me around your facility on March 2, 1995 and discussing with me the possibility of NJIT's participation in developing a treatment technology for the removal/reduction of cyanide in your manufacturing process effluent. The Environmental Engineering Laboratory contains all instrumentation and ancillary required to perform research and analysis of most domestic and industrial wastewaters. The resources of this research facility are further augmented by those of the Hazardous Substances Management Research Center (HSMRC) and the Northeast Hazardous Substances Management Center (NHSRC), both of which are located in NJIT.

As discussed in the telephone conversation on March 2, 1995, NJIT will collect a sample of the process wastewater, and analyze the sample for cyanide (Total Cyanide) concentrations using titrimetric, colorimetric and ion-selective electrode methods. The total cost for performing this analysis by the three different methods will be \$1,650. If this is agreeable to you please send me a letter of contract so that we can start the work immediately. The cost of the analysis will be collected after we submit the analytical report and recommendations for future work/studies.

Sincerely yours, 

Sudhi Mukherjee

cc: Dr. Spillers  
Dr. Hsieh

STEPHEN R. GELLER  
COUNSELLOR AT LAW

CONCENTRATING IN THE LAW OF THE ENVIRONMENT

UNIVERSITY HEIGHTS  
NEWARK, NJ 07102-1982  
201.596.2444/2447

849160298

COOPER, ROSE & ENGLISH

480 Morris Avenue  
Summit, New Jersey 07901-1583  
Telephone (908) 273-1212  
Fax (908) 273-8922

20 Bingham Avenue  
Rumson, New Jersey 07070  
Telephone (908) 741-7777  
Fax (908) 758-1879





# CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

111-3690

December 16, 1992

Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, N.J. 07105

Attention: Mr. Carmine T. Perrapato

Dear Mr. Perrapato:

This is in response to your letter of December 7, 1992 in regards to OCPSF Compliance BMR.

It was determined that the Methylene Chloride reported was the results of metal cleaning compounds used in the machine shop. This use has been discontinued with no Methylene Chloride reported since August 1992.

We have investigated our raw material and chemical process. Based on this information, we have been unable to determine a specific source of the Toluene. However, the source may be as a by-product of one of our reactions of which we presently do not understand.

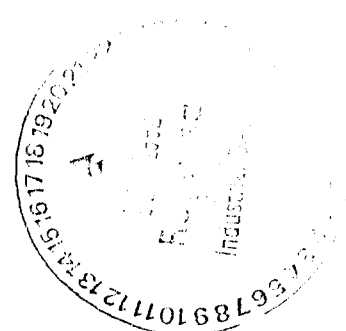
Therefore, we are immediately beginning a program to sample and analyze the waste waters of each step of all of our chemical synthesis.

We have recently purchased a gas chromatograph which we put in service to assist with the analysis in the future. The first set of the product line samples will be analyzed by a certified laboratory. This program will start immediately and we will keep PVSC informed of our results.

Very truly yours,

*Harold Sullivan*  
Harold Sullivan

File



849160300



RONALD W. GIACONIA  
CHAIRMAN

JAMES KRONE  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
THOMAS J. CIFELLI  
DOMINIC W. CUCCINELLO  
RAYMOND LUCHKO  
FRANK ORECHIO  
DONALD TUCKER  
COMMISSIONERS



**Passaic Valley  
Sewerage Commissioners**

**600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951**

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

December 7, 1992

Chemical Compounds, Inc.  
29-75 Riverside Avenue Building #17  
Newark, New Jersey 07104

Certified Mail  
P 093 843 082

Attn: Harold Sullivan

**RE: OCPSF COMPLIANCE BMR**

Dear Mr. Sullivan:

As part of your BMR requirements, volatile organic compound samples were taken at your facility during the month from July through October, 1992. The following samples exceeded the concentration values listed in the regulation.

Sample Date	Parameter	Results (mg/l)	Comments
07/31/92	Toluene	0.555	Exceeded average and maximum values for July
08/28/92	Toluene	0.067	Exceeded average value for August
09/30/92	Toluene	0.194	Exceeded average and maximum value for September
10/23/92	Toluene	4.184	Exceeded average and maximum value for October
07/31/92	Methylene Chloride	0.582	Exceeded average and maximum value for July
08/28/92	Methylene Chloride	0.129	Exceeded average and maximum value for August

You should be aware that the OCPSF regulation is based on mass and that these results could put your company out of compliance with the mass limit. Passaic Valley Sewerage Commissioners is awaiting guidance from EPA which will enable us to make this determination.

**849160301**

**RE: NOTICE OF VIOLATION - CHEMICAL COMPOUNDS, INC.**

December 7, 1992

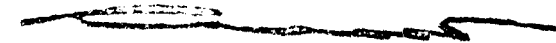
Page 2

In your non-compliance statement signed on 10/20/92, you had no explanation for the presence of either compound, and stated that a review of the contents of your raw materials was begun. Please respond to this letter in writing within 10 days with your findings. Failure to do so could result in enforcement action. Bear in mind that you should investigate the reason for any high result for a parameter regulated under 40 CFR 414 and make the necessary corrections.

If you have any questions concerning this matter, please call Mario Graglia at (201) 817-5724.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS



Carmine T. Perrapato  
Executive Director

CTP/mc

cc: Robert Davenport, Deputy Executive Director  
Frank P. D'Ascensio  
City of Newark

**849160302**

File

RONALD W. GIACONIA  
CHAIRMAN

JAMES KRONE  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
THOMAS J. CIFELLI  
DOMINIC W. CUCCINELLO  
RAYMOND LUCHKO  
FRANK ORECHIO  
DONALD TUCKER  
COMMISSIONERS



600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

October 9, 1992

Crum & Forster  
6 Sylvan Way  
P.O. Box 270  
Parsippany, N.J. 07054

Attention: Ms. Caral J. Harrison

**RE: NAPP-GRECO PIPELINE RENTALS**

Dear Ms. Harrison:

This is in response to your letter dated September 29, 1992 to F. Quintieri, wherein you requested any documentation as to the source of what you claimed were noxious fumes at the Napp-Greco Company on January 7th and 8th, 1992. For your information, we are enclosing our Inspector's reports dated January 7 and January 9, 1992. We have no opinion as to the responsibility of this incident.

If you have any further questions about this matter, please call Mario Graglia at 817-5724.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Frank P. D'Ascensio", written over a horizontal line.

Frank P. D'Ascensio  
Manager of Industrial & Pollution Control

FPD/mc

cc: Carmine T. Perrapato, Executive Director  
Robert Davenport, Deputy Executive Director

849160303

DATE OF VISIT: 1/7/92

COMPANY NAME: Chemical Compounds, Newark

COMPANY REPS: Harold Sullivan, President  
Alberto Celleri, Vice President

CRIMINAL JUSTICE: Frank Bradley  
Vincent K. Cino  
Fern Siegel

DEPE EMERGENCY  
RESPONSE: Matthew Garamone

NEWARK HAZMAT: Battalin Chief, Anthony L. Apostolico

ENSI: Fred Virazzi

PVSC REP: R. Quintieri

PURPOSE: Illegal Discharge

SUMMARY:

In response to a report by New Jersey Criminal Justice of an illegal discharge by Chemical Compounds, I was dispatched to investigate the situation. Upon arrival to the facility at 1:30 pm. I spoke to Mr. Cino, Criminal Justice, who told me that the Maritime police had caught Chemical Compounds illegally discharging wastewater to the river and to the groundwater at the side yard. At the time of my investigation the company had stopped production and all discharges.

I began my investigation by inspecting his process area. There was still trace liquid from his wastewater discharge at the floor drain, the pH was between 2 & 3. I informed Mr. Sullivan, the president of Chemical Compounds, that it was illegal to discharge any waste wastewater below 5.0. I also reminded him the Chemical Compound is not allowed to discharge any of their wastewater because the Company has elected to be considered a zero discharge regulated facility, and has been filing zero discharge reports. Mr. Sullivan stated the company has recently added an additional product line and was in the process of requesting an application to discharge.

849160304

Mr. Sullivan then referred me to Mr. Celleri , Vice President. Mr. Celleri stated that the spill in the process area was caused while the company was transferring the spent acetic acid from their centrifuge which is used to remove the spent acid from his product to the CWM tanker located in the yard outside of the process area.

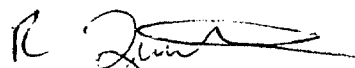
We then proceeded to the stairs outside of the process area where two 5000 gallon tank trailers are parked. Mr. Sullivan stated they pump their process wastewater to the tanker which is then shipped to Chemical Waste Management.

Examination of the yard showed several areas of surface water mixed with waste product. There was also an excavation surrounding their sewer line. Mr. Sullivan stated that the sewer was blocked. (The cause of the blockage was found to be a plug in the line by Napp Greco. The city directed Napp Greco to remove the plug).

The Criminal Justice Department required Chemical Compounds to hire ENSI to immediately remove the surface water and to make preparations to remove the contaminated soil. ENSI used a vacuum pump to pump the water into 55 gallon drums. When ENSI began pumping the wastewater, the Criminal Justices Officials felt that the situation was under control and left the facility.

#### RECOMMENDATION:

I recommend that Chemical Compounds be cited for discharging effluent waste below 5.0, discharging noxious odor and incorrectly reporting zero discharge. The company should also be directed to install a pH control system. I left a Sewer Connection Application with Mr. Sullivan.



R. Quintieri

RQ/mc

849160305

DATE OF VISIT: 1/9/92

COMPANY NAME: Chemical Compounds, Newark

COMPANY REPS: Harold Sullivan, President  
Alberto Celleri, Vice President

CRIMINAL JUSTICE: Frank Bradley  
Fern Siegel

DEPE EMERGENCY  
RESPONSE: Chris Gibbons

Newark Hazmat: A. Apostolico

PVSC REP: R. Quintieri

PURPOSE: Alleged Illegal Discharge

SUMMARY:

In Response to a call by Ms. Siegel concerning another report of an illegal discharge by Chemical Compounds, I re-inspected the facility. At the time of my inspection, I found that the reason for the reported violation that Napp Greco was required to open the sewer line and the vinegar odor returned. It was determined that this was the result of the passage of wastewater through the line after the blockage was removed and was not a new violation. However, it also showed that Chemical Compounds had been discharging process wastewater into the sewer (see 1/7/92 report).

  
\_\_\_\_\_  
R. Quintieri

RQ/mc

849160306

## Chemical Compounds

10/11/92

We did not act upon the Inspector's recommendation that the company be cited since the power line was plugged and there was no discharge to PWSL

The company was sent a letter stating that since they had a discharge, they could no longer certify zero regulated discharge.

*NJE-Newark*

**Crum & Forster  
Commercial Insurance**

A XEROX Financial Services Organization

**North Jersey Regional Office**  
6 Sylvan Way  
P. O. Box 270  
Parsippany, New Jersey 07054  
201 285 0044  
FAX 201 285 0837

September 29, 1992

F.A. Quintieri  
Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, NJ 07105

**Re: The Napp-Grecco Pipeline Rentals**  
**Date of Loss: 1/7/92**  
**Claim No. NJU 80 031675 +**

Dear Sir:

Please advise if you have any documentation as to the source of noxious fumes that affected ten (10) employees of the Napp-Grecco Company, 1500 McCarter Highway, Newark, New Jersey on January 7th and January 8, 1992.

It is my understanding you conducted an investigation. I would appreciate a report of the results of that investigation including your opinion as to causal relationship.

Did you determine the cause to be the responsibility of Napp-Grecco or their neighboring facility, Compound Chemicals?

Your assistance would be most valuable and appreciated.

Yours very truly,

*Caral J. Harrison*

Caral J. Harrison  
Senior Claims Analyst

CJH/jan

**849160308**



DATE OF VISIT: 7/8/92  
COMPANY NAME: Chemical Compounds, Newark  
COMPANY REP: Harold Sullivan  
PVSC REP: G. McLaughlin, A. Caltagirone  
PURPOSE: Reponse to a Spill into Passaic River

SUMMARY:

On 07/08/92 the above company was visited in response to a spill into the Passaic River reported by Mr. Robert Swales of the City of Newark Office of Emergency Management. When we arrived we met Mr. Swales along with Mr. Apostolico, Chief of the Newark Hazmat Team. Chief Apostolico had the company shut down its operations after checking the pH and finding a 4.0, I checked the discharge into the river and found it to be a 3.0. According to Mr. Sullivan, President of Chemical Compunds, his company had recently obtained a permit to discharge into the PVSC system. It was this new sewer line that Chemical Compound had installed that apparently broke, and leaked into the storm drain which flows directly into the Passaic River. Mr. Sullivan had contacted his consultant, Enviro Comp Inc., and the construction company that installed the pipe will be there as soon as possible. Also, Chemical Compounds which manufactures organic dyes is in the process of installing a pH neutralization tank. At this point I recommend the following:

1. Site inspection - we noticed organics that were not properly stored.
2. Installation of PVSC pH recorder.
3. Follow up on equipment being installed and the construction of the sewer line.

  
G. McLaughlin

GM/mc

849160309



State of New Jersey  
Department of Environmental Protection and Energy

Environmental Regulation  
Wastewater Facilities Regulation Element  
CN 029

Trenton, NJ 08625-0029

Scott A. Weiner  
Commissioner

Dennis Hart  
Administrator

APR 22 1992

Harold E. Sullivan, President  
Chemical Compounds, Incorporated  
Riverside Industrial Park  
29-75 Riverside Avenue  
Newark, New Jersey 07104

Re: Treatment Works Approval Determination  
Chemical Compounds, Inc., 29-75 Riverside Avenue  
City of Newark, Essex County

Dear Mr. Sullivan:

I am writing in response to your letter dated March 25, 1992, regarding the reconnection of an existing industrial building, from an existing private sewer which has been plugged with concrete, to an existing sanitary sewer within the industrial park. In your request, and subsequent letters dated March 30, 1992 and April 13, 1992, you have stated the following facts:

1. That the present amount of sewage generated from the existing building is approximately 770 gallons per day.
2. That the parties responsible for the proposed lateral are Chemical Compounds, Inc., and the owner of the Riverside Industrial Park, Industrial Developments, Inc.
3. That no future connections could be made to the proposed sewer lateral which will be a sewer line dedicated to the Chemical Compounds building only.
4. That this is the only property in this area without sanitary sewer service and that the neighboring properties are connected to an existing sanitary sewer main.

Based on the information submitted with this request, the Department of Environmental Protection and Energy will not require a Treatment Works Approval for the reconnection of the aforementioned building.

If you have any further questions on this matter, please contact Nicholas Horiates of my staff at (609) 984-4429.

Sincerely,

*James Pontoriero*  
James Pontoriero, Supervising Engineer  
Northern Section  
Bureau of Construction and Connection Permits

WFR317

c: Passaic Valley Sewerage Commissioners  
City of Newark

CHEMICAL COMPOUNDS - NEWARK

2/18/92

1/10/90 TO FIVE - COMPANY HAS MANIFESTED MATERIAL  
OUT TO C.W.M.

PER PHONE CONVERSATION HAROLD SULLIVAN  
INFORMED HIM TO CORRECT SCA FIVE'S  
32, 34

SAMPLING FOR PHC DONE WROTE ANALYSIS HIGH  
CN(T) ANALYSIS HIGH  
PH LOW

TTVO'S HIGH

INFORMED HIM TO CONTACT THE DEP  
(609) - 292-1637 DIV. WATER RESOURCES  
HELEN PETTIT IF A C/P PACKAGE IS REQUIRED

SCA ON HOLD TILL IT IS DETERMINED IF  
C/P PACKAGE IS REQUIRED.

# Newark

Sharpe James  
Mayor

## Department of Engineering

920 Broad Street,  
Newark, New Jersey 07102  
(201) 733-8520

Alvin L. Zach P.E., L.S.  
Director

FEB 1992

COMM.	FD
GA	SMC
JP	JS
RD	LL
WS	QA
SL	SEC.
PH	

February 5, 1992

Harold Sullivan, President  
Chemical Compounds Inc.  
29-75 Riverside Avenue  
Newark, New Jersey 07104

Dear Mr. Sullivan:

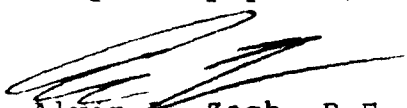
I have been informed that you contacted the Department of Land Use Control concerning your blocked sewer connector. I would advise you the City of Newark did not disconnect your sewer line. This was apparently done by your neighbor to the south, Napp Grecco Company. It would appear there is concrete in a manhole by the fence where your sewer line enters their property.

My staff has reviewed municipal sewer records and this line does not appear as a municipal sewer. Therefore, there will be no action by the City of Newark in this matter. I would recommend that you seek counsel for advice as to how to proceed to rectify this situation between private parties.

I would add that you should also request that PVSC allow you to tie a dedicated line from your facility into their interceptor which is just west of your current sewer line.

If you should need further assistance, please do not hesitate to contact me.

Very truly yours,

  
Alvin L. Zach, P.E., L.S., Director  
Department of Engineering

ALZ/PB/cmc

RECEIVED	
DATE	2/11/92
TIME	10:16
BY	PN 4/16
INITIALS	PN

cc: Sharpe James, Mayor  
Glenn A. Grant, Acting Business Administrator  
Edwin McLucas, Director, Department of Land Use Control  
William Schwartz, Assistant Corporation Counsel  
Millard Monroe, Manager, Division of Inspections  
Daniel Berardinelli, Manager, Div. of Water/Sewer Utility  
Deputy Chief Alfred Freda, Newark Fire Department  
~~Executive Director, Passaic Valley Sewerage~~  
~~Commissioners~~

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RAYMOND LUCHKO  
VICE CHAIRMAN

ROBERT M. BURKE JR.  
THOMAS J. CIEFELLI  
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FRANK C. LEBLANC  
COMMISSIONERS



Passaic Valley  
Sewerage Commissioners

600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

January 29, 1992

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

Chemical Compounds  
29-75 Riverside Avenue  
Newark, New Jersey 07104

Certified Mail  
P 715 788 031

Attn: Harold Sullivan, President

RE: OCPSF MONITORING

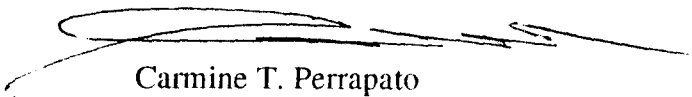
Dear Mr. Sullivan:

On January 7, 1992, Passaic Valley Sewerage Commissioners received a report from the New Jersey Criminal Justice Department that there was an illegal discharge by your company into the Passaic River and to the ground outside in the yard. An inspector was sent to investigate. He met with representatives of your company, Criminal Justice, NJDEPE Emergency Response, Newark HazMat, and E.N.S.I.

Inspection of the process area revealed that there was wastewater discharged to the floor drain and that the pH was between 2-3. This material was found to be spent acetic acid from your centrifuge. Since your company processes are covered by the OCPSF regulation (40 CFR 414) and it has been demonstrated that you do indeed have a discharge, you can no longer certify zero regulated discharge. Therefore, you are hereby directed to submit an MR-1 report to PVSC with sample results for all regulated OCPSF parameters, starting with February, 1992. (Report for February is due by March 21, 1992). A copy of the MR-1 form is enclosed. Failure to do so could result in fines and other penalties. If you have any questions, please call Mario Graglia at (201) 817-5724.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

  
Carmine T. Perrapato  
Executive Director

FPD/mc

Enclosure

cc : Robert Davenport, Deputy Executive Director  
Frank P. D'Ascensio

849160313

DATE OF VISIT: 1/9/92

COMPANY NAME: Chemical Compounds, Newark

COMPANY REPS: Harold Sullivan, President  
Alberto Celleri, Vice President

CRIMINAL JUSTICE: Frank Bradley  
Fern Siegel

DEPE EMERGENCY  
RESPONSE: Chris Gibbons

Newark Hazmat: A. Apostolico

PVSC REP: R. Quintieri

PURPOSE: Alleged Illegal Discharge

SUMMARY:

In Response to a call by Ms. Siegel concerning another report of an illegal discharge by Chemical Compounds, I re-inspected the facility. At the time of my inspection, I found that the reason for the reported violation that Napp Greco was required to open the sewer line and the vinegar odor returned. It was determined that this was the result of the passage of wastewater through the line after the blockage was removed and was not a new violation. However, it also showed that Chemical Compounds had been discharging process wastewater into the sewer (see 1/7/92 report).

  
\_\_\_\_\_  
R. Quintieri

RQ/mc

DATE OF VISIT: 1/7/92

COMPANY NAME: Chemical Compounds, Newark

COMPANY REPS: Harold Sullivan, President  
Alberto Celleri, Vice President

CRIMINAL JUSTICE: Frank Bradley  
Vincent K. Cino  
Fern Siegel

DEPE EMERGENCY  
RESPONSE: Matthew Garamone

NEWARK HAZMAT: Battalin Chief, Anthony L. Apostolico

ENSI: Fred Virazzi

PVSC REP: R. Quintieri

PURPOSE: Illegal Discharge

**SUMMARY:**

In response to a report by New Jersey Criminal Justice of an illegal discharge by Chemical Compounds, I was dispatched to investigate the situation. Upon arrival to the facility at 1:30 pm, I spoke to Mr. Cino, Criminal Justice, who told me that the Maritime police had caught Chemical Compounds illegally discharging wastewater to the river and to the groundwater at the side yard. At the time of my investigation the company had stopped production and all discharges.

I began my investigation by inspecting his process area. There was still trace liquid from his wastewater discharge at the floor drain, the pH was between 2 & 3. I informed Mr. Sullivan, the president of Chemical Compounds, that it was illegal to discharge any waste wastewater below 5.0. I also reminded him the Chemical Compound is not allowed to discharge any of their wastewater because the Company has elected to be considered a zero discharge regulated facility, and has been filing zero discharge reports. Mr. Sullivan stated the company has recently added an additional product line and was in the process of requesting an application to discharge.

**849160315**

Mr. Sullivan then referred me to Mr. Celleri , Vice President. Mr. Celleri stated that the spill in the process area was caused while the company was transferring the spent acetic acid from their centrifuge which is used to remove the spent acid from his product to the CWM tanker located in the yard outside of the process area.

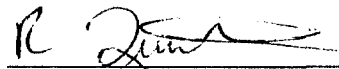
We then proceeded to the stairs outside of the process area where two 5000 gallon tank trailers are parked. Mr. Sullivan stated they pump their process wastewater to the tanker which is then shipped to Chemical Waste Management.

Examination of the yard showed several areas of surface water mixed with waste product. There was also an excavation surrounding their sewer line. Mr. Sullivan stated that the sewer was blocked. (The cause of the blockage was found to be a plug in the line by Napp Greco. The city directed Napp Greco to remove the plug).

The Criminal Justice Department required Chemical Compounds to hire ENSI to immediately remove the surface water and to make preparations to remove the contaminated soil. ENSI used a vacuum pump to pump the water into 55 gallon drums. When ENSI began pumping the wastewater, the Criminal Justices Officials felt that the situation was under control and left the facility.

#### RECOMMENDATION:

I recommend that Chemical Compounds be cited for discharging effluent waste below 5.0, discharging noxious odor and incorrectly reporting zero discharge. The company should also be directed to install a pH control system. I left a Sewer Connection Application with Mr. Sullivan.



R. Quintieri

RQ/mc

849160316



IDENTITY FOR PASSAIC VALLEY SEWERAGE COMMISSIONERS

DAVENPORT

CHARLES A. LAGOS  
VICE CHAIRMAN

THOMAS J. CIFELLI  
VINCENT CORRADO, SR.  
KENNETH W. HAYDEN  
DONALD TUCKER  
COMMISSIONERS

**Passaic Valley  
Sewerage Commissioners**

600 WILSON AVENUE  
NEWARK, N. J. 07105  
(201) 344-1800

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

JAMES M. PIRO  
CHIEF COUNSEL

NORMAN E. DARMSTATTER  
CLERK

May 6, 1988


Harold Sullivan, Pres.  
Chemical Compounds Inc.  
29-75 Riverside Avenue  
Newark, NJ 07104

**RE: PVSC Interceptor Inspection**

Dear Mr. Sullivan.

The PVSC Interceptor Inspection referred to in our letter of April 26, 1988 has been rescheduled to take place on Monday May 16, 1988. We again request, in order to protect the safety of our employees, that you refrain from discharging any process waste water that would include quantities of volatile substances in such amounts as to prevent entry into the sewer from 10:00 pm on Sunday May 15, 1988 through 5:00 am on Monday May 16, 1988. Thank you for your cooperation.

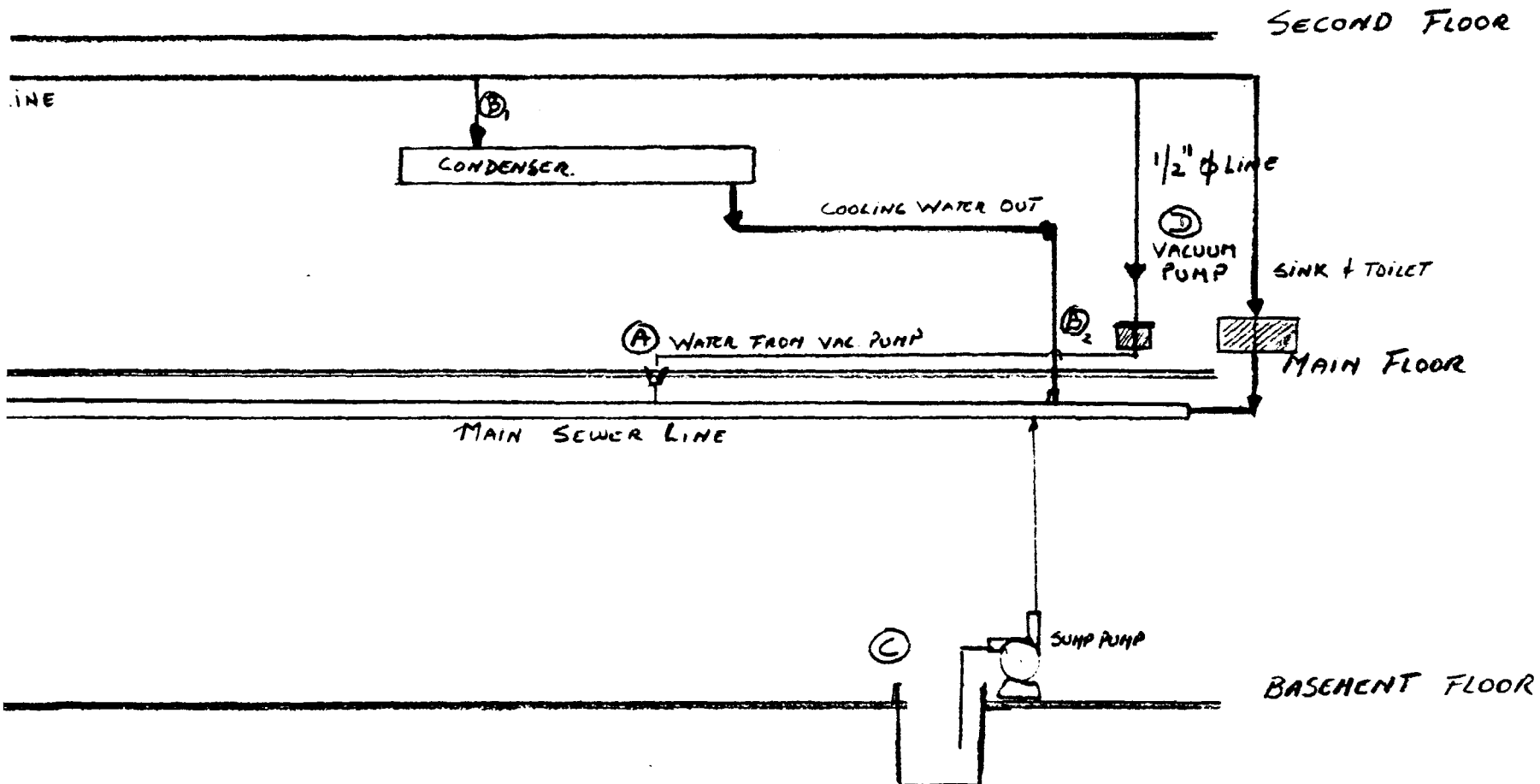
PASSAIC VALLEY SEWERAGE COMMISSIONERS

  
Carmine T. Perrapato  
Executive Director

cc: Frank P. D'Ascensio

849160317

- A & D<sub>2</sub> - SINKING LINES  
 B<sub>1</sub> - VALVE FOR COOLING PURPOSES  
 C - COLLECTS WATER FROM BOILER  
 & FLOOR CLEANING.  
 D - WATER SEAL FROM VAC PUMP



CHEMICAL COMPOUNDS INC

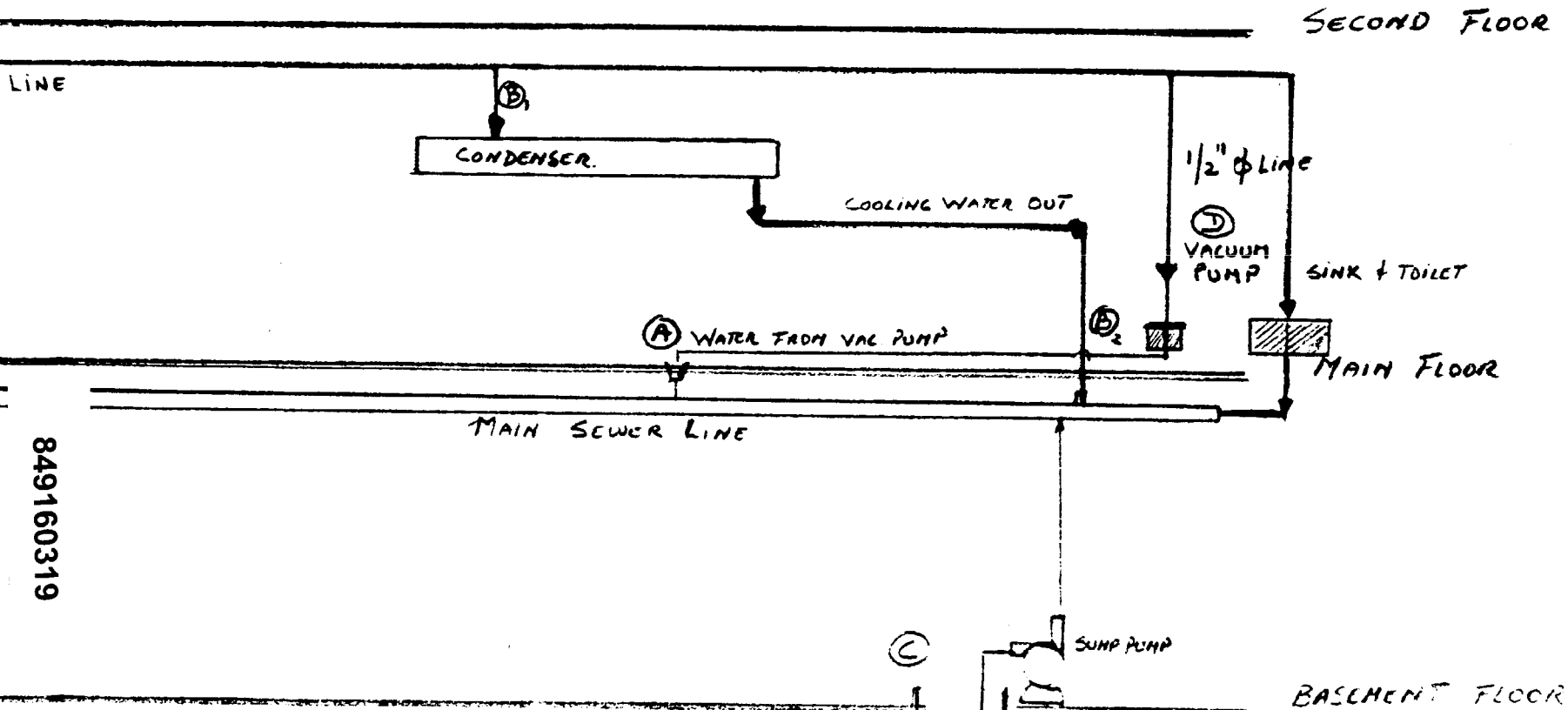
WATER DISTRIBUTION PLOT PLAN

JAN 5/88

A. COLLIER

849160318

- A & B<sub>2</sub> - SAMPLE LINES  
 B<sub>1</sub> - WATER FOR COOLING PURPOSES  
 C - COLLECTS WATER FROM BOILER  
 & FLOOR CLEANING.  
 D - WATER SEAL FROM VAC PUMP

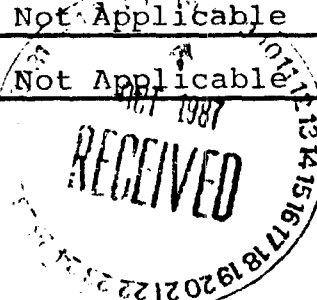


(100) - 2500

**PASSAIC VALLEY SEWERAGE COMMISSIONERS  
APPLICATION FOR A SEWER CONNECTION PERMIT**

**SECTION A**

- ✓ 1. Company Name: Chemical Compounds, Inc.
2. Permit number if applicable, N/A
3. Location: 29-75 Riverside Avenue, Building #17, Newark, New Jersey  
Zip Code: 07104
4. Mailing Address: Same as Above  
Zip Code: \_\_\_\_\_
- ✓ 5. Person to contact concerning information provided in this application:  
Name of Contact Official: Harold E. Sullivan  
Title: President Phone No. (201) 485-3211  
Address: Same as Above Zip Code \_\_\_\_\_
6. Number of Employees - Full Time: 2 Part Time: 2  
Number of Work Days Per Year: \_\_\_\_\_  
Number of Shifts Per Day: One
7. If property is owned indicate block and lot numbers:  
Block 614 Lot 66  
Assessed Value: \$33,700.00 1987
8. If property is rented indicate name and address of owner:  
N/A  
\_\_\_\_\_  
\_\_\_\_\_  
Total square feet rented: N/A
9. List NJPDES Permit number if applicable, Not Applicable ar  
name of receiving body of water entered Not Applicable



## SECTION B

### WATER DATA

10. Water Source: (Circle all appropriate answers)

<u>Purchased</u>	Y - <u>N</u>		
Well	Y - N	If Y, is it metered	Y - N
River	Y - N	If Y, is it metered	Y - N

11. Name of purchased water supplier: City of Newark

List all Acct #s: 10-783-577-100

12. Water Received: From Mo. NONE Yr.      Through Mo.      Yr.     

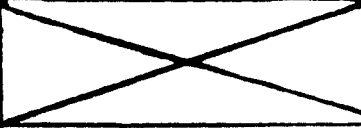
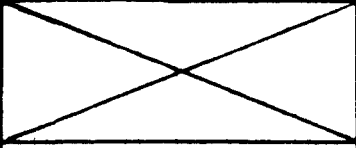
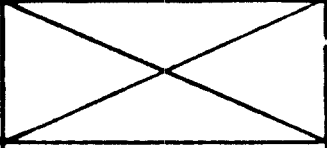
(\* Next to a figure means it is estimated).

	<u>PURCHASED</u>	<u>WELL</u>	<u>RIVER</u>	<u>TOTAL</u>
1st Qtr.	N/A			
2nd Qtr.	N/A			
3rd Qtr.	N/A			
4th Qtr.	N/A			

**GRAND TOTAL**                     

Report in gallons

13. Water Use and Disposition (\* Next to a figure means it is estimated).

	Gallons Sanitary/Combined Sewer	Discharged Stormsewer/ River/Ditch	Gallons Used Other
Sanitary Service Only	N/A		
Process Waste Water	N/A		
Cooling Water	N/A		
Evaporation			
Contained in the product			
Other (Describe) <u>                    </u>			

**GRAND TOTAL**

**SECTION B (CONTINUED)**

14. Process wastewater which is discharged as above is metered as follows: N/A

to the Separate Sanitary Sewer	Y - N
to the Combined Sewer	Y - N
to a storm sewer	Y - N
river or ditch	Y - N

15. Waste Hauler Information: List all firms and/or independent contractors used to remove process waste or sludge from this facility.

Contractor	Address	Icc#	Waste type handled
None			None

**SECTION C**

**OPERATIONAL CHARACTERISTICS**

16. Discharge of Industrial Waste is continuous N/A  
or intermittent \_\_\_\_\_ each operating day.

If the discharge is intermittent, it occurs between the following hours: 8:00 A.M. - 5:00P

✓ 17. Brief description of Manufacturing or other activity performed: \_\_\_\_\_

Chemical Manufacturing

Warehousing

✓ 18. Principal Raw Materials used: Ammonia, Adipic Acid, Methanol, Benzoic Acid

19. Principal Products or Services: Ammonium Adioate,

Ammonium Benzoate

**SECTION C (CONTINUED)**

20. Describe seasonal variations, if significant, giving dates, volumes, rates, hours, etc. Include variations in product lines which affect waste characteristics: N/A

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**SECTION D**

**MONITORING**

21. Describe any pretreatment process or effluent monitoring system in use:

Outlet None None

Outlet None None

Outlet None None

22. Sampling information

<u>Outlet</u>	<u>Contains Ind. Waste</u>	<u>Sampler Type</u>	<u>Refrigerated</u>
None	None	None	None

**SECTION D (CONTINUED)**

**23. Volume Information**

<u>Outlet</u>	<u>Daily Flow (Gallons)</u>	<u>Metered (Y - <u>N</u>)</u>	<u>Type</u>	<u>Date</u>
Nash Vacuum Pump	200		Material Balance	9/21/87
Reactor Jacket	900			9/21/87
Condenser	1200			9/21/87

**24. Frequency of calibration of each flow meter:** N/A

**25. Attach a plot plan of the property showing:**

- (a) all existing or proposed sewer and drain lines (including outlets to a storm sewer, river or ditch);
- (b) sample point (s); Monitoring or Pretreatment Equipment;
- (c) details of the connection (s) to the municipal (or PVSC) sewer, including the distance and direction of each connection from the nearest street intersection.

NONE



## SECTION E

### ANALYSIS OF INDUSTRIAL WASTE

26. Analysis for Industrial Waste must be a proper sample taken for each outlet.

OUTLET NO.       N/A      

Report to the nearest unit: XX. except where indicated with (1) Example: 15 mg/l			Report to the nearest hundredth: 0.X except where indicated Example: 0.36 mg/l		
Code	Parameter	Value	Code	Parameter	
0200*	Radioactivity (PL-1)		1097*	Antimony (Sb)	
0500	Total Solids		1002*	Arsenic (As)	
0510	Total Mineral Solids		1022*	Boron (B)	
0530	Total Suspended Solids		1027*	Cadmium (Cd)	
0552	Mineral Suspended Solids		1034*	Chromium Total (Cr)	
0555 (1)(3)	Petroleum Hydrocarbons		1042*	Copper (Cu)	
0310	Biochemical Oxygen Demand (BOD)		1045*	Iron (Fe)	
			1051*	Lead (Pb)	
0340	Chemical Oxygen Demand (COD)		0720*(3)	Cyanide (CN)	
			1900*	Mercury(Report to 0.XXX)	
0680	Total Organic Carbon (TOC)		1067*	Nickel (Ni)	
			1147*	Selenium (Se)	
0745* (1)	Sulfide		1077*	Silver (Ag)	
9000 (1)(3)	pH (standard unit range)		1102*	Tin (Sn)	
0625* (1)	Kjeldahl N as N		1092*	Zinc (Zn)	
0610* (1)	Ammonia as N		2730*	Phenol	
0507* (1)	Ortho Phosphates as P		4053*	Pesticides (Report to 0.XXX)	
9998* (2)(3)	TTO ( Report to 0.XXX)		9999(2)(3)	TTVO(Report to 0.XXX)	

#### FOOTNOTES:

(1) Report results to the nearest tenth, i.e., 1.6 mg/L

(\*) Analyze for this if reasonably expected to be present in the discharge.

(2) See instructions.

(3) Grab sample required.

**SECTION E (CONTINUED)**

Samples collected by: N/A New Operation

Date: \_\_\_\_\_

Samples analyzed by: N/A

Date: \_\_\_\_\_

Products being manufactured when sample was collected: N/A

27. Who performs the analysis of the samples for User Charge? N/A

28. Is the Laboratory certified by NJDEP to conduct all the analyses? Y - N \_\_\_\_\_

N/A

29. Who performs the analyses of the samples for the pretreatment parameters? N/A

(If monitoring has not commenced for pretreatment, indicate laboratory you plan to use. If  
unknown, so state): N/A

30. Is The Laboratory certified by NJDEP to conduct all the required Pretreatment analyses?

Y - N \_\_\_\_\_ N/A

31. Based upon knowledge of materials and processes used at this facility check the appropriate box  
that best describes the potential that a Priority Pollutant, listed on Tables 1, 2, & 3 is present in  
your discharge.

NONE

849160326

## SECTION F

## PRETREATMENT

32. Industrial Category: N/A

Subpart (s): N/A

33. Compliance date(s): N/A

34. Date Baseline Monitoring Report (BMR) submitted to PVSC: NONE

35. Compliance schedule submitted? N/A

**If yes is facility on schedule? Explain if compliance date will not be met:**

36. Does this facility come under the Resource Conservation and Recovery Act (RCRA)?

YES

**37. Does this facility have a Spill Prevention Control and Countermeasures (SPCC) plan?**

NO

**If yes, describe:** \_\_\_\_\_

38. Has this facility ever been cited by NJDEP or EPA for a violation of State or Federal Regulations for the nature of its wastewater discharge? Y - N NO

**CERTIFICATION:**

The information contained in this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete, and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority sign the application on behalf of the corporation.

Name of signing official: Harold E. Sullivan  
**PRINT**

TITLE: President

9/28/87  
**DATE**

Harold E. Sullivan  
**SIGNATURE**

**TABLE 1 EPA PRIORITY POLLUTANTS**

**CHECK APPROPRIATE BOX**

NAME	A	B	C	D		A	B	C
acensaphthene					2,4 dimethylphenol			
acrolein					2,4 dinitrotoluene			
acrylonitrile					2,6 dinitrotoluene			
benzene					1,2 diphenylhydrazine			
benzidine					ethylbenzene			
carbon tetrachloride					fluoranthene			
(tetrachloromethane)					4-chlorophenyl phenyl ether			
chlorobenzene					4-bromophenyl phenyl ether			
1,2,4-trichlorobenzene					bis(2-chloroisopropyl) ether			
hexachlorobenzene					bis(2-chloroethoxy) methane			
1,2 dichloroethane					methylene chloride			
1,1,1, trichlorethane					(dichloromethane)			
hexachloroethane					methyl chloride			
1,1, dichloroethane					(chloromethane)			
1,1,2 trichloroethane					methyl bromide			
1,1,2,2, tetrachloroethane					(bromomethane)			
chlorethane					bromoform(tribromomethane)			
bis(chloromethyl) ether					dichlorobromomethane			
bis(2 chloroethyl) ether					trichlorofluoromethane			
2-chloroethyl vinyl ether (mixed)					dichlorodifluoromethane			
2-chloronaphthalene					chlorodibromomethane			
2,4,6, trichlorophenol					hexachlorobutadiene			
parachlorometa cresol					hexachlorocyclopentadiene			
chloroform (trichloromethane)					isophorone			
2 chlorophenol					naphthalene			
1,2, dichlorobenzene					nitrobenzene			
1,3, dichlorobenzene					2-nitrophenol			
1,4, dichlorobenzene					4-nitrophenol			
3,3, dichlorobenzidine					2,4-dinitrophenol			
1,1, dichloroethylene					4,6 dinitro-o cresol			
1,2, trans-dichloroethylene					N-nitrosodimethylamine			
2,4, dichlorophenol					N-nitrosodiphenylamine			
1,2, dichloropropane					N-nitrosodi-n-propylamine			
1,3 dichloropropylene					pentachlorophenol			
(1,3 dichloropropene)					phenol			

- A. KNOWN TO BE PRESENT**  
**B. SUSPECTED TO BE PRESENT**  
**C. KNOWN TO BE ABSENT**  
**D. SUSPECTED TO BE ABSENT**

**TABLE 1 EPA PRIORITY POLLUTANTS (CONTINUED)**

**CHECK APPROPRIATE BOX**

NAME	A	B	C	D		A	B
bis(2-ethylhexyl) phthalate					endrin		
butylbenzylphthalate					endrin aldehyde		
di-n-butylphthalate					heptachlor		
di-n-octylphthalate					heptachlor (epoxide)		
diethylphthalate					BHC Alpha		
dimethylphthalate					BHC Beta		
benzo(a)anthracene					BHC Gamma		
benzo(a)pyrene					BHC Delta		
3,4 benzofluoranthene					PCB-1242		
benzo(k)fluoranthene					PCB-1254		
chrysene					PCB-1221		
acenaphthylene					PCB-1232		
anthracene					PCB-1248		
benzo(ghi)perylene					PCB-1260		
fluorene					PCB-1016		
phenanthrene					toxaphene		
dibenzo(a,h)anthracene					antimony (total)		
indeno(1,2,3-c,d)pyrene					arsenic (total)		
pyrene					asbestos (fibrous)		
tetrachloroethylene					beryllium (total)		
toluene					cadmium (total)		
trichloroethylene					chromium (total)		
vinyl chloride					copper (total)		
aldrin					cyanide (total)		
dieldrin					lead (total)		
chlordane					mercury (total)		
4,4 DDT					nickel (total)		
4,4 DDE					selenium (total)		
4,4 DDD					silver (total)		
endosulfan I					thallium (total)		
endosulfan II					zinc (total)		
endosulfan sulfate					2,3,7,8, tetrachlorodibenzo p-dioxin		

- A. KNOWN TO BE PRESENT**  
**B. SUSPECTED TO BE PRESENT**  
**C. KNOWN TO BE ABSENT**  
**D. SUSPECTED TO BE ABSENT**

**TABLE 1 NJDEP EXPANDED PRIORITY POLLUTANTS**

**CHECK APPROPRIATE BOX**

NAME	A	B	C	D		A	B	C
acrylamide					n,n-dimethyl aniline			
amitrole					3,3-dimethyl benzidine			
amyl alcohols					1,1-dimethylhydrazine			
aniline hydrochloride					dioxane			
anisole					diphenylamine			
auramine					ethylenimine			
benzotrìchloride					hydrazine			
benzylamine					4,4'-methylene bis (2-chloroaniline)			
o-chloroaniline					4,4'-methylenedianiline			
m-chloroaniline					methyl isobutyl ketone			
p-chloroaniline					alpha-naphthylamine			
1-chloro-2-nitrobenzene					beta-naphthylamine			
1-chloro-4-nitrobenzene					n-methylaniline			
chloroprene					1,2-phenylenediamine			
chrysoidine					1,3-phenylenediamine			
cumene					1,4-phenylenediamine			
2,3-dichloroaniline					sudan I (solvent yellow 14)			
2,4-dichloroaniline					thiourea			
2,5-dichloroaniline					toluene sulfonic acids			
3,4-dichloroaniline					toluidines			
3,5-dichloroaniline					xyldines			
1,3-dichloropropene								
1,3-dimethoxybenzidine								

- A. KNOWN TO BE PRESENT**  
**B. SUSPECTED TO BE PRESENT**  
**C. KNOWN TO BE ABSENT**  
**D. SUSPECTED TO BE ABSENT**

**TABLE 3 EPA HAZARDOUS SUBSTANCES**

**CHECK APPROPRIATE BOX**

NAME	A	B	C	D		A	B	C
acetaldehyde					isopropanolamine			
allyl alcohol					kelthane			
allyl chloride					kepone			
amyl acetate					malathion			
aniline					mercaptodimethur			
benzonitrile					methoxychlor			
benzyl chloride					methyl mercaptan			
butyl acetate					methyl methacrylate			
butylamine					methyl parathion			
captan					mevinphos			
carbaryl					mexacarbate			
carbofuran					monoethyl amine			
carbon disulfide					monomethyl amine			
chlorpyrifos					naled			
coumaphos					naphthalic acid			
cresol					nitrotoluene			
crotonaldehyde					parathion			
cyclohexane					phenolsulfonate			
2,4-D (2,4-dichlorophenoxy					phosgene			
acetic acid)					propargite			
diazinon					propylene oxide			
dicamba					pyrethrins			
dichlobenil					quinoline			
dichlone					resorcinol			
2,2-dichloropropionic acid					strontium			
dichlorvos					strychnine			
diethyl amine					stryrene			
dimethyl amine					2,4,5-T (2,4,5-trichloro-			
					phenoxy acetic acid)			
dinitrobenzene					TDE (tetrachloro-			
					diphenylethane)			
diquat					2,4,5-TP 2-(2,4,5-			
					trichlorophenoxy)			
					propanoic acid			
disulfoton					trichlorofon			
diuron					triethylamine			
epichlorohydrin					trimethylamine			

- A. KNOWN TO BE PRESENT  
 B. SUSPECTED TO BE PRESENT  
 C. KNOWN TO BE ABSENT  
 D. SUSPECTED TO BE ABSENT



**TABLE 3 EPA HAZARDOUS SUBSTANCES (CONTINUED)**

**CHECK APPROPRIATE BOX**

NAME	A	B	C	D		A	B	C
ethanolamine					uranium			
ethion					vanadium			
ethylene diamine					vinyl acetate			
ethylene dibromide					xylene			
formaldehyde					xlenol			
furfural					zirconium			
guthion								
isoprene								

- A. KNOWN TO BE PRESENT
- B. SUSPECTED TO BE PRESENT
- C. KNOWN TO BE ABSENT
- D. SUSPECTED TO BE ABSENT

ELAN CHEMICAL

849160353

DANIEL F. BECHT, ESQ.  
CHAIRMAN

THOMAS J. CIFELLI  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
DOMINIC W. CUCCINELLO  
RONALD W. GIACONIA  
JAMES KRONE  
RAYMOND LUCHKO  
FRANK ORECHIO  
DONALD TUCKER  
COMMISSIONERS

**Passaic Valley  
Sewerage Commissioners**

600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

ROBERT J. DAVENPORT  
EXECUTIVE DIRECTOR

PETER G. SHERIDAN  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

October 14, 1994 ✓

Mr. Yury Langer  
Elan Chemical Company  
268 Doremus Avenue  
Newark, New Jersey 07105

Certified Mail  
P 252 571 838

**RE: NOTICE OF VIOLATION  
PERMIT #: 20403242  
VIOLATION DATE: AUGUST, 1994  
SECTION VIOLATED: 40 CFR 414 SV**

Dear Mr. Langer:

You are put on notice that your company is in violation of Federal Regulation 40 CFR 414 and Section 313.1 of the PVSC Rules and Regulations. A review of your MR-1 for August, 1994 revealed the following mass limit exceedance:

A sample for methylene chloride taken by your company on 08/02/94 resulted in a mass loading of 59.95440 g/day, exceeding the monthly average limit of 18.39837 g/day, by more than 20%.

You should be aware that a monthly average of all samples taken either by you or PVSC that is 20% or more above the monthly average limitation for a hazardous pollutant makes the violation a serious violation and that two (2) serious violations in any six month period would make a company a Significant Non Complier (SNC). In addition, four monthly average violations of any amount in any six month period would also make a company SNC. This would subject your company to mandatory minimum fines under the Clean Water Enforcement Act (CWEA). Based upon the explanation given above, your company has committed a serious violation as a defined by the Clean Water Enforcement Act. Since your company is in the process of entering into a Judicial Consent Order (JCO) with PVSC for past OCPSF exceedances, this matter is being referred to the PVSC Counsel for settlement.

**849160335**

**RE: NOTICE OF VIOLATION - ELAN CHEMICAL - NEWARK**

October 14, 1994

Page 2

As far as the August, 1994 MR-1 report deficiencies, the compliance statement did not reflect the methylene chloride permit exceedance. Additionally all sample measurements in grams/day and permit requirements must be to five decimal places, as stated in your permit, from this point forward. Please submit a corrected compliance statement within 5 days of receipt of this letter. Failure to do so could result in fines and other penalties. You should forward your response to the attention of the Industrial Department. If you have any questions please call Andy Caltagirone at (201)817-5723.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

A handwritten signature in dark ink, appearing to read "Robert J. Davenport", is written over a horizontal line.

Robert J. Davenport  
Executive Director

RJD/mc

cc: Frank P. D'Ascensio  
Gabriel M. Ambrosio, Esq.  
City of Newark

849160336

111-6337



INCORPORATED 268 DOREMUS AVE. NEWARK, N.J. 07105 (201) 344-8014

FAX: (201) 344-1948

Passaic Valley Sewerage Comm.  
600 Wilson Ave.  
Newark NJ 07105

Attn: Carmine Perrapato

Apr. 6th. 1992

**Re; Cyanide non-compliance**

Dear Sir,

We are very surprised at the high (3.99mg/l) cyanide content of our effluent on 3/11, we assume you mean 1992. All the previous samples taken by PVSC, CH2 and by Elan for the monthly Pretreatment and Monitoring Report show very minor or no cyanide content.

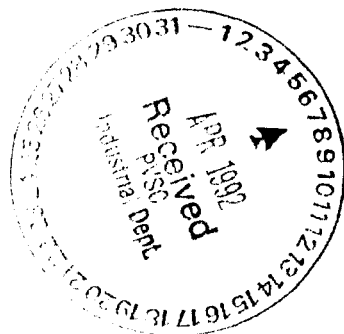
We are therefore trying to determine the source of the cyanide to ensure that future discharges will not exceed the compliance limits.

Please address all future compliance notifications to the undersigned, as previously requested.

Very truly Yours,

ELAN CHEMICAL CO.

A handwritten signature in cursive script, reading "Karol Sulimirski".  
Karol Sulimirski  
Project Engr.



849160337

DONALD TUCKER  
CHAIRMAN

RAYMOND LUCHKO  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
THOMAS J. CIFELLI  
DOMINIC W. CUCCINELLO  
RONALD W. GIACONIA  
JAMES KRONE  
FRANK ORECHIO  
COMMISSIONERS



600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

March 27, 1992

Elan Chemical Co.  
268 Doremus Avenue  
Newark, NJ 07105  
Attn: Jon Vassiliades

CERTIFIED RECEIPT  
P 034 413 554

**RE: OCPSE COMPLIANCE**

Dear Mr. Vassiliades:

On 3/11/91 a cyanide (T) sample was taken at your facility by PVSC Inspectors. The result was 3.99 mg/l. You should be aware that the OCPSE regulation is based on mass and that a cyanide result of 3.99 mg/l could exceed the mass limit contained in the regulation. This would put your company out of compliance with the mass limit. PVSC is awaiting guidance from EPA which will enable us to make this determination. Therefore, you should investigate the reason for this high cyanide result and develop a plan on how to reduce such discharge since it could be determined to exceed the limitation. This holds true for all regulated parameters under 40 CFR 414.

Please respond to this letter in writing within ten days with an explanation for this result and with a plan to reduce the cyanide discharges in the future. Failure to do so could lead to enforcement action. If you have any questions concerning this matter, please call Mario Graglia at (201) 817-5724.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

A handwritten signature in black ink, appearing to read "Carmine T. Perrapato", is written over a horizontal line.

Carmine T. Perrapato  
Executive Director

CTP/sml

cc: Robert Davenport, Deputy Executive Director  
Frank D'Ascensio  
City of Newark

849160338

# ÉLAN CHEMICAL COMPANY

268 DOREMUS AVENUE

NEWARK, NEW JERSEY 07105

TELEPHONE 201-344-8014

## AROMA CHEMICAL PRICE LIST

April 1, 1975  
QUARTERLY ISSUE

	<u>Quantity</u>	<u>Net</u>
Aldehyde C-14 so-called (Gamma Undecalactone) .....	25 lbs.....	\$ 6.55/lb.
Aldehyde C-16 so-called (Ethyl Methyl Phenyl Glycidate).....	25 lbs.....	4.20/lb.
Aldehyde C-18 so-called (Gamma Nonalactone).....	25 lbs.....	10.60/lb.
-Allyl Caproate (Allyl Hexanoate).....	25 lbs.....	2.70/lb.
-Allyl Cyclohexyl Propionate.....	25 lbs.....	8.10/lb.
Allyl Heptoste.....	25 lbs.....	4.70/lb.
Amyl Benzoate.....	25 lbs.....	2.65/lb.
-Amyl Caproate (Amyl Hexanoate).....	25 lbs.....	2.85/lb.
Amyl Cinnamate.....	25 lbs.....	6.70/lb.
Amyl Formate.....	25 lbs.....	1.85/lb.
Amyl iso-Valerate.....	25 lbs.....	2.85/lb.
Amyl Phenyl Acetate.....	25 lbs.....	3.90/lb.
Amyl Propionate.....	25 lbs.....	2.00/lb.
Anisyl Acetate.....	25 lbs.....	7.35/lb.
Anisyl Formate.....	25 lbs.....	23.00/lb.
Anisyl Propionate.....	25 lbs.....	10.00/lb.
Benzyl Butyrate.....	25 lbs.....	2.25/lb.
Benzyl iso-Butyrate.....	25 lbs.....	3.00/lb.
Benzyl iso-Valerate.....	25 lbs.....	4.75/lb.

DECREASE IN PRICE

849160339

April 1, 1975  
QUARTERLY ISSUE

	<u>Quantity</u>	<u>Net</u>
Benzyl Phenyl Acetate.....	25 lbs.....	\$ 4.50/lb.
Benzyl Propionate.....	25 lbs.....	1.75/lb.
Benzyl Salicylate.....	25 lbs.....	2.10/lb.
n-Butyl Anthranilate.....	25 lbs.....	8.75/lb.
n-Butyl Butyrate.....	25 lbs.....	2.05/lb.
n-Butyl Propionate.....	25 lbs.....	3.80/lb.
n-Butyl iso-Valerate.....	25 lbs.....	4.65/lb.
cedrenol.....	25 lbs.....	4.90/lb.
Cedrol Special.....	25 lbs.....	4.30/lb.
Cedryl Acetate Élan.....	25 lbs.....	4.70/lb.
Cinnamyl Acetate.....	25 lbs.....	4.65/lb.
Cinnamyl Formate.....	25 lbs.....	5.80/lb.
Cinnamyl iso-Butyrate.....	25 lbs.....	8.25/lb.
Cinnamyl iso-Valerate.....	25 lbs.....	10.00/lb.
Cinnamyl Propionate.....	25 lbs.....	7.75/lb.
Citronellol 90/92%.....	25 lbs.....	4.30/lb.
Citronellol 96/98%.....	25 lbs.....	4.95/lb.
Citronellyl Acetate.....	25 lbs.....	4.75/lb.
Citronellyl Butyrate.....	25 lbs.....	6.10/lb.
Citronellyl Formate.....	25 lbs.....	5.80/lb.
4-Citronellyl iso-Butyrate.....	25 lbs.....	5.75/lb.
Decalactone-Delta.....	25 lbs.....	18.00/lb.
Decyl Acetate (Acetate C-10).....	25 lbs.....	3.75/lb.
Diethyl Sebacate.....	25 lbs.....	4.60/lb.

-DECREASE IN PRICE  
+ INCREASE IN PRICE

849160340



April 1, 1975  
QUARTERLY ISSUE

	<u>Quantity</u>	<u>Net</u>
+ Diethyl Succinate.....	25 lbs.....	\$ 2.50/lb.
Dimethyl Octanol.....	25 lbs.....	3.10/lb.
Dimethyl Succinate.....	25 lbs.....	3.45/lb.
Diphenyl Methane.....	25 lbs.....	2.00/lb.
Dodecalactone-Delta.....	25 lbs.....	18.00/lb.
Ethyl Benzoate.....	25 lbs.....	1.40/lb.
-Ethyl Caproate (Ethyl Hexanoate).....	25 lbs.....	2.45/lb.
Ethyl Caprylate (Ethyl Octanoate).....	25 lbs.....	3.80/lb.
+ Ethyl Cinnamate.....	25 lbs.....	5.25/lb.
Ethyl Decylate (Ethyl Caprate).....	25 lbs.....	3.90/lb.
Ethyl Heptoate.....	25 lbs.....	3.80/lb.
Ethyl iso-Butyrate.....	25 lbs.....	3.00/lb.
Ethyl iso-Valerate.....	25 lbs.....	3.65/lb.
Ethyl N-Valerate.....	25 lbs.....	3.75/lb.
-Ethyl Laurate.....	25 lbs.....	2.60/lb.
Ethyl Levulinate.....	25 lbs.....	8.40/lb.
Ethyl Myristate.....	25 lbs.....	3.35/lb.
Ethyl Pelargonate (Ethyl Nonanoate).....	25 lbs.....	3.50/lb.
+ Ethyl Phenyl Acetate.....	25 lbs.....	3.50/lb.
Eugenol ex Bay Oil.....	25 lbs...On Application.....	
Geraniol for Soap.....	25 lbs.....	3.50/lb.
-Geraniol 90/92%.....	25 lbs.....	4.50/lb.
-Geraniol 96/98%.....	25 lbs.....	5.15/lb.
Geranyl Acetate Extra.....	25 lbs.....	5.10/lb.

-DECREASE IN PRICE  
+ INCREASE IN PRICE

849160341

April 1, 1975  
QUARTERLY ISSUE

	Quantity	Net
Geranyl Butyrate.....	25 lbs.....	\$ 5.75/lb.
Geranyl Formate.....	25 lbs.....	5.95/lb.
Geranyl Propionate.....	25 lbs.....	6.20/lb.
Guaiac Wood Acetate Extra.....	25 lbs.....	5.75/lb.
Heptyl Acetate.....	25 lbs.....	4.50/lb.
Hexyl Acetate.....	25 lbs.....	2.80/lb.
Hexyl Caprylate (Hexyl Octanoate).....	25 lbs.....	6.00/lb.
Hexyl n-Butyrate.....	25 lbs.....	6.25/lb.
Hexyl iso-Butyrate.....	25 lbs.....	6.25/lb.
Hexyl Propionate.....	25 lbs.....	5.25/lb.
Iso-Amyl Alcohol (Natural).....	25 lbs.....	1.35/lb.
Iso-Amyl Benzyl Ether.....	25 lbs.....	2.40/lb.
Iso-Bornyl Formate.....	25 lbs.....	5.30/lb.
Iso-Bornyl Propionate.....	25 lbs.....	3.05/lb.
Iso-Butyl Anthranilate.....	25 lbs.....	8.50/lb.
Iso-Butyl Benzoate.....	25 lbs.....	1.60/lb.
Iso-Butyl Caproate (Iso-Butyl Hexanoate).....	25 lbs.....	3.35/lb.
+ Iso-Butyl Cinnamate.....	25 lbs.....	5.75/lb.
Iso-Butyl iso-Valerate.....	25 lbs.....	4.65/lb.
Iso-Butyl Phenyl Acetate.....	25 lbs.....	2.80/lb.
Iso-Propyl Cinnamate.....	25 lbs.....	6.00/lb.
Iso-Pulegyl Acetate.....	25 lbs.....	5.00/lb.
Lauryl Acetate (Acetate C-12).....	25 lbs.....	3.95/lb.
Linalool Natural.....	25 lbs....	On Application.....

- DECREASE IN PRICE  
 INCREASE IN PRICE

849160342

April 1, 1975  
QUARTERLY ISSUE

	<u>Quantity</u>	<u>Net</u>
Linalyl acetate Natural 90/92%.....	25 lbs.... On Application.....	
Linalyl Acetate Natural 96/98%.....	25 lbs.... On Application.....	
Methoxy Phenyl Butanone.....	25 lbs.....	\$ 9.60/lb.
-Methyl Eugenol.....	25 lbs.....	8.00/lb.
Methyl Hexyl Ketone (Octenone-2).....	25 lbs.....	1.60/lb.
-Methyl iso-Eugenol.....	25 lbs.....	8.50/lb.
+Methyl Phenyl Acetate.....	25 lbs.....	2.85/lb.
Methyl Undecylenate.....	25 lbs.....	5.05/lb.
*Neryl Acetate.....	25 lbs.....	5.35/lb.
Nonalactone-Delta.....	25 lbs.....	23.00/lb.
Nonanol-2.....	25 lbs.....	15.25/lb.
Nonyl Acetate (Acetate C-9).....	25 lbs.....	10.20/lb.
Nonyl Alcohol (Nonanol-1).....	25 lbs.....	11.70/lb.
Octyl Acetate (Acetate C-8).....	25 lbs.....	2.55/lb.
Octyl iso-Butyrate.....	25 lbs.....	2.50/lb.
Geranethic Ether.....	25 lbs.....	2.85/lb.
Para Cresyl Acetate.....	25 lbs.....	2.95/lb.
Para Cresyl Caprylate (Para Cresyl Octanoate).....	25 lbs.....	7.55/lb.
Phenoxy Ethyl iso-Butyrate.....	25 lbs.....	4.35/lb.
-Phenyl Acetaldehyde Dimethyl Acetal.....	25 lbs.....	5.00/lb.
Phenyl Acetaldehyde Ethylene Glycol Acetal.....	25 lbs.....	8.10/lb.
Phenyl Ethyl N-Butyrate.....	25 lbs.....	4.60/lb.
Phenyl Ethyl Cinnamate (Crystal).....	25 lbs.....	12.50/lb.
Phenyl Ethyl Formate.....	25 lbs.....	5.70/lb.
Phenyl Ethyl iso-Butyrate.....	25 lbs.....	4.50/lb.

April 1, 1975  
QUARTERLY ISSUE

	<u>Quantity</u>	<u>Net</u>
-Phenyl Ethyl iso-Valerate.....	25 lbs.....	\$ 5.00/lb.
Phenyl Ethyl Phenyl Acetate.....	25 lbs.....	5.30/lb.
Phenyl Ethyl Propionate.....	25 lbs.....	4.60/lb.
Phenyl Propyl Alcohol.....	25 lbs.....	3.60/lb.
Phenyl Propyl Acetate.....	25 lbs.....	4.00/lb.
Phenyl Propyl N-Butyrate.....	25 lbs.....	6.15/lb.
n-Propyl Propionate.....	25 lbs.....	3.00/lb.
Styralyl Propionate.....	25 lbs.....	3.70/lb.
Terpinyl Propionate.....	25 lbs.....	2.35/lb.
Tolyl Acetate.....	25 lbs.....	6.50/lb.
Vetiveryl Acetate All Grades.....	25 lbs... On Application.....	

-DECREASE IN PRICE

ALL PRICES DELIVERED METROPOLITAN AREA OR F.O.B., NEWARK, N. J.

PRICE DIFFERENTIALS:

\$2.50/lb. on 25 lb. price for 1 lb. lots.

.70/lb. on 25 lb. price for 5 lb. lots.

.35/lb. on 25 lb. price for 10 lb. lots.

.05/lb. off 25 lb. price for 100 lb. lots.

.10/lb. off 25 lb. price for 200 lb. lots.

.15/lb. off 25 lb. price for 400 lb. drum.

849160344

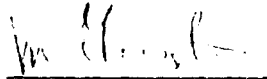
File

DATE OF VISIT	8-26-85
COMPANY NAME	Elan Chemical
COMPANY REPS	Karol Sulemerski, Plt. Eng. John Vassiliades, V.P. Production
PVSC REP	M. Gunster
PURPOSE	pH Compliance

#### SUMMARY

An acid discharge took place of approximately 3,000 gallons into PVSC sewer system August 23rd at about 3 a.m. It lasted several hours. Carol Sulimerski was on vacation at the time, therefore, an explanation for the occurrence came from John Vassiliades. He stated an acid tank was released into the treatment system, the caustic supply soon became depleted and serious damage resulted causing leaks and corrosion to the metal pipe system. The damage is estimated at about \$10,000 dollars. Mr. Vassiliades said the workman responsible was fired and solinoids will be placed on all holding tanks so discharge will stop if pH adjustment ceases.

I reminded them that PVSC should have been notified immediately on Friday morning when the incident occurred, instead of finding out thru routine pH investigation.

  
\_\_\_\_\_  
M. Gunster

MG/cc

11/11/60

# ORGANIC CHEMICALS QUESTIONNAIRE

Below are listed twenty one different organic chemicals. Please indicate whether you purchase and use any of them. Also, please list the average quantity (in pounds) purchased each month for the previous 6 months (July 1984 through January 1985). If you have any questions call Frank D'Ascensio or Mario Graglia of the Industrial Department of PVSC at 344-1800.

Company Name ELAN CHEMICAL CO

Address 268 DORMUS DR

Permit No. 2040 3240 Date 3/20/85

Name of Chemical	Purchased Yes or No	Avg. Lbs./Mon Purchased
Benzene	NO	
Carbon tetrachloride	NO	
Chlorobenzene	NO	
Chloroform	NO	
1, 1-Dichloroethane	NO	
1, 2-Dichloroethane	YES	13780
1, 2-Dichloropropane	NO	
Ethylbenzene	NO	
Methylene Chloride	NO	
Tetrachloroethylene	NO	
Toluene	YES	6120
1, 2-Trans-Dichloroethylene	NO	
1, 1, 1-Trichloroethane	NO	
1, 1, 2-Trichloroethane	NO	
Trichloroethylene	NO	
Pentachlorophenol	NO	
Phenol	NO	
Naphthalene	NO	
Bis (2-Chloroethoxy) Methane	NO	
2-Chloronaphthalene	NO	
Di-N-Butyl Phthalate	NO	

Signature [Signature]

Title [Signature]

849160346

## PASSAIC VALLEY SEWERAGE COMMISSIONERS

(Y) or N

## SEWER CONNECTION APPLICATION

Applicant is:  
Corporation ☒  
Partnership ☐  
Other ☐

## PART I - SECTIONS A-C

## SECTION A: GENERAL INFORMATION

- ✓ 1. Company Name: ELAN CHEMICAL CO
2. Location: 268 DOREMUS AVE  
NEWARK, N.J. Zip Code: 07105
3. Mailing Address: 268 DOREMUS AVE  
NEWARK, N.J. Zip Code: 07105
- Name, title, address and telephone number of person to contact concerning information provided in this application:
- ✓ 4. Name of Contact Official: MR. PETER BROMBERG  
Title: CHAIRMAN OF BOARD Phone No.: 344-8014
5. Address: ELAN CHEMICAL CO. 268 DOREMUS AVE, NEWARK, N.J.
6. Number of Employees - Full Time: 62 Part Time:
7. Number of Work Days Per Week: 5  
Number of Shifts Per Day: 3  
Is production seasonal? NO If so, explain:
8. New Users Only: Indicate date user desires to commence operations:
9. If property is owned, indicate Lot and Block Numbers: BLOCK 5014 LOT 8 (268 DOREMUS) - L&A  
BLOCK 5014 LOT 9 (268 DOREMUS) - L&A 1977 Assessed Value: L&A - 13,100  
L&A - 9,600
10. If property is rented, indicate name and address of Landlord:  
~~BLOCK 5014 LOT 8~~  
~~BLOCK 5014 LOT 9~~

## SECTION B: PRODUCT OR SERVICE INFORMATION

- ✓ 11. Brief description of manufacturing or other activity performed:  
MFG. OF ORGANIC CHEMICALS FOR FRAGRANCE & FLAVOR INDUSTRY - PERFORM ORGANIC  
REACTIONS ON 100 TO 4,000 GAL SIZE (REACTIONS, ESTERIFICATION, SAPONIFICATION, REDUCTIONS)  
PURIFICATION OF ORG. CHEMICALS BY DISTILLATION, WASHING, CRYSTALLIZATION & DRYING.
12. Principal raw materials used: ESSENTIAL OILS, SYNTHETIC ORGANIC ALCOHOLS  
FATTY ACIDS, ESTERS, SOLVENTS AND INORGANIC ALKALIS/ACIDS.
13. Principal products or services: CHEMICALS FOR FRAGRANCE & FLAVOR  
INDUSTRY

849160347

SECTION C: WATER DATA

14. Water Received: Year 1979 (Report Volume in Gallons)

	PURCHASED	WELL	RIVER	TOTAL
1st Qtr.	5,311,000	0	0	5,311,000
2nd Qtr.	8,727,000	0	0	8,727,000
3rd Qtr.	12,143,000	0	0	11,143,000
4th Qtr.	11,434,000	0	0	11,434,000
19 GRAND TOTAL . . . .				37,615,000

NOTE: Cu. Ft. X 7.48 = Gallons

15. Name water supplier: CITY OF NEWARK Account#: 10-787-6900-00

16. Is well water metered? NONE Is river water metered? NONE

17. Water Distribution: Year 1979 (Report Volume in Gallons)

Use (List totals in gallons per year)

(a) sanitary sewer (include industrial & domestic) 32,751,000  
 (b) separate storm sewer, river, or ditch. . . . . 0  
 (c) contained in product . . . . . 0  
 (d) evaporation. . . . . 4,864,000  
 (e) waste haulers. . . . . 0

Name, Address & Registration Number of Waste Haulers Used \_\_\_\_\_

18. Is volume in 17 (a) measured? No How? METERED WATER IN-ESTIMATED OUT

Certification:

The information contained in Part I of this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

Name of Signing Official: PETER BRUMBERG

Title: PRESIDENT

28 DEC 1979  
Date

Peter Brumberg  
Signature



PART II - SECTIONS D-F

These sections must be completed if the Applicant:

- (a) discharges more than 25,000 gallons per day of either domestic and/or industrial wastes to the sanitary or combined sewer, or,
- (b) discharges toxic wastes or wastes which can have a significant impact on the PVSC treatment works.

Questions regarding the applicability of this form to your facility may be answered by contacting the Industrial Department of PVSC at 344-1800.

Company Name: ELAN CHEMICAL CO.

Location: 268 DOREMUS AVE NEWARK, N.J. 07105

SECTION D: OPERATIONAL CHARACTERISTICS

- 19. Discharge of industrial waste is continuous ✓ or intermittent \_\_\_\_\_
- 20. Discharge of industrial waste occurs between the following hours: \_\_\_\_\_  
OVER 24 HOUR PERIOD
- 21. Industrial Waste is, or may be discharged:
  - (a) only to the sanitary (or combined) sewer ONLY TO SANITARY SEWER
  - (b) to both the sanitary (or combined) sewer and a separate storm sewer, river or ditch \_\_\_\_\_
  - (c) NPDES Permit Number \_\_\_\_\_
- 22. Describe seasonal variations, if any, during past, present, or future. Include variations in product lines which affect waste characteristics.  
MINOR SEASONAL VARIATION.
- 23. Describe any pretreatment process in use: NO PRETREATMENT

24. Describe any treatment process applied to raw water taken into the plant:

THE WATER USED FOR BOILERS ± 15GPM IS SOFTENED

25. Describe any processes used to recycle water: 95% OF WATER USED BESIDES WATER USED IN BOILERS IS USED FOR COOLING PURPOSES AND IS RECYCLED THRU WATER COOLING TOWERS WITH A CONSTANT BLEED TO SEWER & MAKE UP

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

SECTION E: SEWER CONNECTION INFORMATION

26.

OUTLET * NUMBER	SEWER SIZE (INCHES)	DAILY FLOW (GALLONS)	CONTAINS INDUSTRIAL WASTE (YES OR NO)
1	6	126,000	YES

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

Attach a plot plan of the property, showing:

- (a) all existing or proposed sewer and drain lines (including outlets to a storm sewer, river or ditch);
- (b) sample point(s);
- (c) details of the connection(s) to the municipal (or PVSC) sewer, including the distance and direction of each connection from the nearest street intersection.

\*If only one outlet, leave blank.

Number multiple outlets starting with 1.

849160350

# SECTION F: ANALYSIS OF INDUSTRIAL WASTE

27. Analysis listed below is based on a composite sample of industrial waste taken from the following outlets listed in Section E:

OUTLET # 1 (ONLY OUTLET)

(See instructions for proportioning samples from more than one outlet)

28. Analytical Data: Concentration values are to be reported in mg/l (ppm) unless specified otherwise; analyze waste for those parameters marked with an asterisk (\*), analyze waste for other parameters reasonably expected to be present. Code numbers are for internal use only.

REPORT TO THE NEAREST UNIT: X (EXAMPLE: 150 mg/l)		
CODE	PARAMETER	VALUE
* 0100	Color (Apha Units)	
0200	Radioactivity (PI-1)	
* 0500	Total Solids	6400 PPM
* 0505	Total Volatile Solids	546 PPM
* 0510	Total Mineral Solids	
* 0530	Total Suspended Solids	400 PPM
* 0540	Volatile Suspended Solids	400 PPM
* 0550	Mineral Suspended Solids	
* 0070	Turbidity (JTU)	200
0550	Emulsified Oil or Grease	4 PPM
* 0940	Chlorides	177 PPM
* 0945	Sulfates	
* 0310	Biochemical Oxygen Demand (BOD)	1,000 PPM
* 0340	Chemical Oxygen Demand (COD)	1,460 PPM
* 0680	Total Organic Carbon (TOC)	320 PPM

REPORT TO THE NEAREST TENTH: 0.X (EXAMPLE 1.6 mg/l)		
CODE	PARAMETER	VALUE
0745	Sulfide	
0740	Sulfite	
8260	Surfactants (MBAS)	
* 9000	pH (standard units) (range)	6.4
0625	Kjeldahl N as N	
0610	Ammonia as N	
0620	Nitrate as N	
0615	Nitrite as N	
0507	Ortho Phosphates as P	

849160351

REPORT TO THE NEAREST HUNDREDTH: 0.XX (EXCEPT WHERE INDICATED) (EXAMPLE: 0.36 mg/l)		
CODE	PARAMETER	VALUE
1097	Antimony (Sb)	
1002	Arsenic (As)	0.004 LESS THAN 0.02 PPM
1022	Boron (B)	
1037	Cadmium (Cd)	0.07
1034	Chromium Total (Cr)	0.2
1042	Copper (Cu)	0.741
1045	Iron (Fe)	
1051	Lead (Pb)	0.111

REPORT TO THE NEAREST HUNDREDTH: 0.XX (EXCEPT WHERE INDICATED) (EXAMPLE: 0.36 mg/l)		
CODE	PARAMETER	VALUE
	(Report to	
1900	Mercury 0.XXX)	0.000
1067	Nickel (Ni)	1.11
1147	Selenium (Se)	
1077	Silver (Ag)	
1102	Tin (Sn)	
1092	Zinc (Zn)	0.313
	(Report to	
4053	Pesticides 0.XXX)	
2730	Phenol	62 PPM

29. Samples collected by: ED KROLL Date: 3/24/75

30. Samples analyzed by: U.S. TESTING CO. INC. Date: 4/24/75

Products being manufactured when sample was collected: NORMAL MIX OF PRODUCTS.

Certification:

The information contained in Part II of this application is familiar to me and, to the best of my knowledge and belief, such information is true, complete, and accurate.

If the applicant is a corporation, a corporate resolution is attached granting me the authority to sign the application on behalf of the corporation.

31. Name of Signing Official: PETER BRUMBERG

Title: PRESIDENT

28 DECEMBER 1977

Date

Peter Brumberg

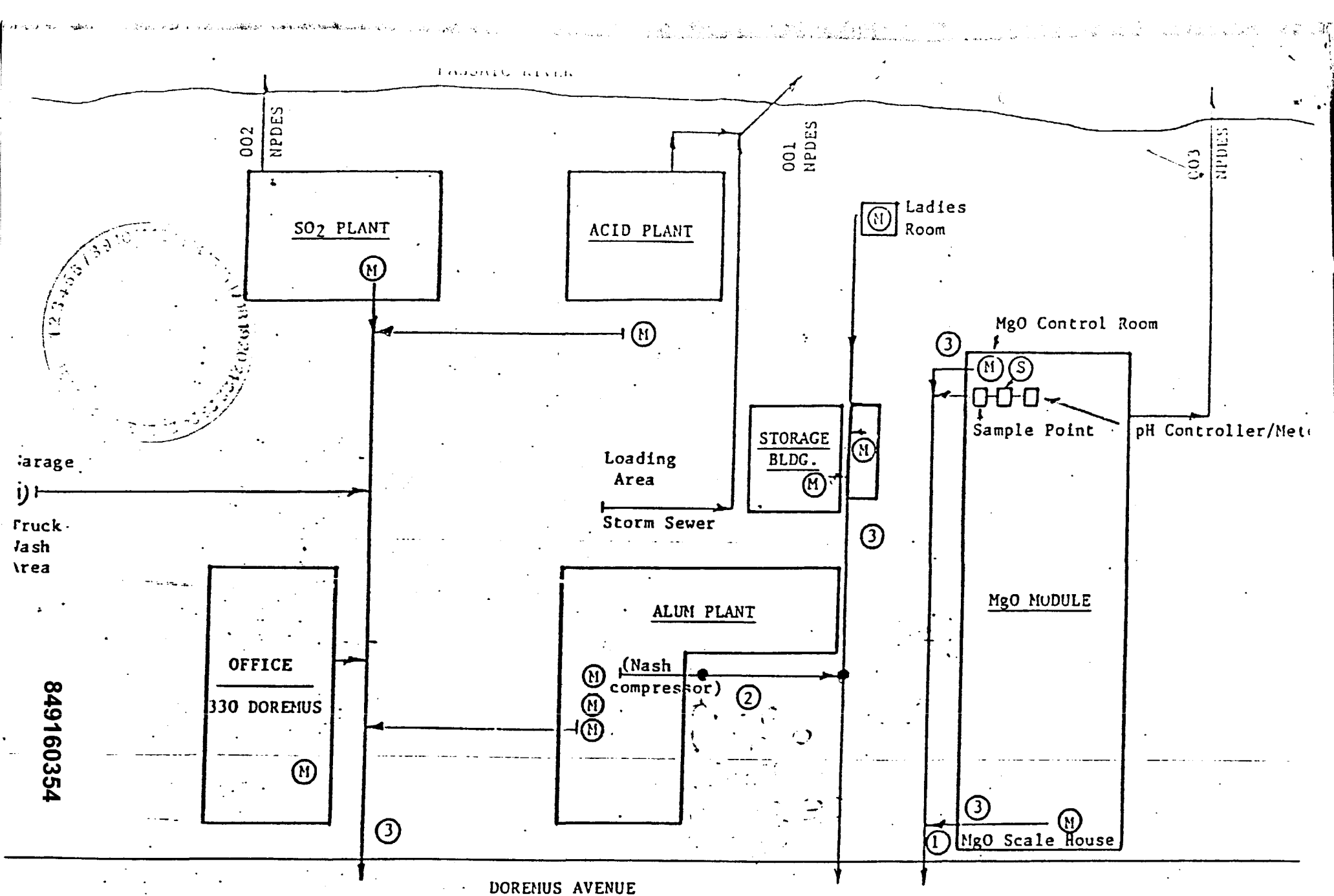
Signature

(T1-4)

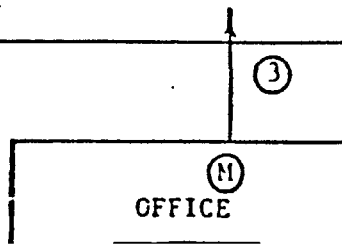
849160352

ESSEX INDUSTRIAL CHEMICALS CO.

849160362



Code: (1) - Sewer Number  
 (M) - Water Meter for Sewer Flow  
 (S) - Sewer Meter



Essex Industrial Chemicals, Inc.  
 Newark Plant  
 PVSC Sewer Connections  
 A. D. Soos

Hillside, NJ 07205

**Fax** (201) 688-8966

MEYER KLEIN, M.S., Lab. Supervisor

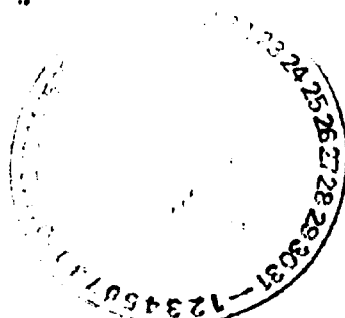
**DATE SUBMITTED: 9/30/88**

ATT: MR. HOBSON

**TIME SAMPLED:**

[illegible]

RESULTS ARE IN mg/l  
UNLESS NOTED.



**849160355**

# GARDEN STATE LABORATORIES, INC.

*Bacteriological and Chemical Testing*

410 Hillside Avenue

Hillside, NJ 07205

Telephone (201) 688-8900

Fax (201) 688-8966

NEW KLEIN, M.S., Director

VEY KLEIN, M.S., Lab. Supervisor

## REPORT OF WASTEWATER ANALYSIS

TO: ESSER CHEMICAL  
351 DOREMUS AVENUE

REPORT # 80810173

CLIENT # ESS01

DATE SUBMITTED: 8/19/99

NEWARK

NJ 07105

ATT: MR. HOBSON

SAMPLE TYPE: WASTEWATER

SAMPLE ID: EFFLUENT

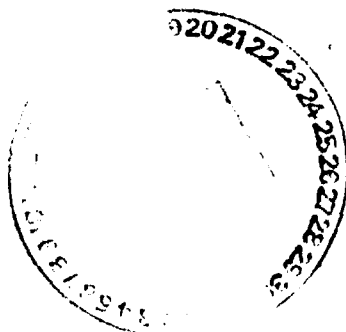
SAMPLE LOCATION: MGD GRAB MODULE

DATE SAMPLED:

TIME SAMPLED:

ANALYSIS	RESULT
BIOCHEMICAL OXYGEN DEMAND, 5 DAY	0
TOTAL SUSPENDED SOLIDS	2162

RESULTS ARE IN mg/l  
UNLESS NOTED.



849160356



114-4741

# ORGANIC CHEMICALS QUESTIONNAIRE

Below are listed twenty one different organic chemicals. Please indicate whether you purchase and use any of them. Also, please list the average quantity (in pounds) purchased each month for the previous 6 months (July 1984 through January 1985). If you have any questions call Frank D'Ascensio or Mario Graglia of the Industrial Department of PVSC at 344-1800.

✓ Company Name Essex Industrial Chemicals, Inc.

Address 330 Doremus Avenue, Newark, N.J.

Permit No. \_\_\_\_\_ Date March 26, 1985

Name of Chemical	Purchased Yes or No	Avg. Lbs./Mon Purchased
Benzene	No	
Carbon tetrachloride	No	
Chlorobenzene	No	
Chloroform	No	
1, 1-Dichloroethane	No	
1, 2-Dichloroethane	No	
1, 2-Dichloropropane	No	
Ethylbenzene	No	
Methylene Chloride	No	
Tetrachloroethylene	No	
Toluene	No	
1, 2-Trans-Dichloroethylene	No	
1, 1, 1-Trichloroethane	Yes	1 Drum (55 Gal.)/Month
1, 1, 2-Trichloroethane	No	
Trichloroethylene	No	
Pentachlorophenol	No	
Phenol	No	
Naphthalene	No	
Bis (2-Chloroethoxy) Methane	No	
2-Chloronapthalene	No	
Di-N-Butyl Phthalate	No	

Signature [Signature]

Title President

849160357

Note: 1,1,1-Trichloroethane is purchased as a proprietary solvent for degreasing parts for the Maintenance Department. None of this material is disposed of to the sanitary sewer system.

I.S. Zonis

file

D. INPUT FORM FOR VIOLATIONS  
(Number in parenthesis is maximum number of characters)

NAME(30) ESSEX INDUSTRIAL CHEMICAL  
 SCP-NO(8) 20402311 VIO-DATE(8) 11/20/84  
 VIO-ID(15) 312.1b V-ORIG-DUE(8) 11/21/84  
 V-DESCRIP(35) Sulfuric Acid Spill

V-STATDATE(8) <u>11/21/84</u>	V-STATUS(35) <u>Cleaned up,</u>
<u>letter sent, see report</u>	
V-STATDATA(8) _____	V-STATUS-A(35) _____
V-STATDATB(8) _____	V-STATUS-B(35) _____
V-STATDATC(8) _____	V-STATUS-C(35) _____
V-RVDUDATE(8) _____	V-RVSTATUS(35) _____
V-RVDUDATA(8) _____	V-RVSTATUA(35) _____
V-RVDUDATB(8) _____	V-RVSTATUB(35) _____
V-RVDUDATC(8) _____	V-RVSTATUC(35) _____
V-FORMAL(1) <u>N</u>	V-ELIMDATE(8) <u>12.17.84</u>

REMARKS - ADD ON REVERSE



# ESSEX INDUSTRIAL CHEMICALS, INC.

A SUBSIDIARY OF ESSEX CHEMICAL CORPORATION

1401 BROAD STREET • CLIFTON, NEW JERSEY 07015

PHONE (201) 721-6300

DEC 1984  
RECEIVED

December 17, 1984

800 - 287-1

N.J. Department of Environmental Protection  
Division of Waste Management  
120 Route 156  
Yardville, N.J. 08620

Attn: Mr. John Hoyle

Re: Spill of November 20, 1984 at the Newark Plant (alum digester).

Dear Mr. Hoyle:

On November 20th at about 12:45 p.m. a spill of a mixture of bauxite, aluminum sulfate and sulfuric acid occurred at our Newark plant which is located at 351 Doremus Ave.

A small length of pipe between the alum digester and the pump failed suddenly. Several hundred gallons of the mix spilled onto the asphalted ground outside the alum plant. About 1,000 to 2,000 gallons spilled into the city (Passaic Valley Sewerage Commission) sewer. The remainder, inside the digester, was pumped back to a storage tank.

The mix was originally a 42% sulfuric acid solution partially reacted with bauxite into aluminum sulfate (alum).

The sewer line was flushed immediately with 10,000 gallons of water and PVSC notified. Later, Mr. John Sabo inspected the scene and was satisfied with the clean-up activities. No adverse effects were noticed by PVSC at their treatment plant.

The outside spill was soaked up and contained by bauxite. The bauxite was used in the next few days to make aluminum sulfate on site. NJDEP was notified and visited the scene and verbally approved the clean-up activities. Browning-Ferris was contacted and arrived during the afternoon to vacuum up the bauxite for later rework.

The remaining 42% sulfuric acid mix was used in the next alum batch.

The Newark plant responded quickly and efficiently in cleaning up and minimizing the spill. There were no injuries and almost no environmental impact.

849160359

Page 2

NJDEP

Spill of 11/20/84

December 17, 1984


The length of pipe that failed, also known as the spool piece, was made of 304 stainless steel and was replaced with an alloy 20 spool piece.

As a preventive measure, operating procedures for alum manufacturing have been changed to reduce the probability of such failures to occur in the future. In addition, the sewer connection will be equipped with a plug or valve to prevent accidental discharge of pollutants into the sewer.

If there should be any other questions, please give this writer a call.

Very truly yours,

ESSEX INDUSTRIAL CHEMICALS, INC.

  
A. D. Spas  
Chemical Engineer

ADS:dm

Certified # P480033730

cc: A. Hobson

D. James

J. Kelly

P. Prudente

J. Smigel

A. Steiner/File

R. Wagner

J. Sabo, PVSC (express mail)  
6 Wilson Ave.  
Newark, N.J. 07105

849160360

DATE OF VISIT

November 21, 1984

COMPANY NAME

Essex Chemical - Newark

COMPANY REP

Pat Purdente, Production Manager

PVSC REP

John Sabo

PURPOSE

Investigation of acid spill of 11/20/84

SUMMARY:

Mr. Purdente gave me the following explanation:

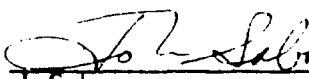
A recently replaced tank coupling, a section of the piping of an alum digester, had been eaten away by the sulfuric acid contained in the vessel. The steel used to manufacture the new coupling was not able to withstand the corrosive properties of the acid.

Once the leak began, the acid flowed into a nearby floor drain and into a open vacuum pump. Before the proper safety personnel and equipment arrived, approximately 2000 gallons has entered the sewer.

The remaining acid has been removed. The tank coupling has been replaced with one which will withstand the acid. Since the floor drain is no longer used, it will be sealed.

The open flange vacuum pump will be raised to a height so that no material from the floor will be able to enter. Therefore, any future spills will be contained in the building.

Mr. Purdente will send PVSC a letter as soon as possible outlining a schedule for completing the steps as described above.

  
J. Sabo

JS/mc 11/20/84 - Called Pat Purdente - He stated that the spill occurred between 12<sup>00</sup> and 1<sup>00</sup> pm on 11/20/84 and that approximately 2000 gal of acid was spilled into the sewer. He stated that he will send PVSC a letter late this week or early next week outlining steps to prevent recurrence. (JVS)

849160361

E.I. DuPONT DE NEMOURS & CO.  
DUPONT  
(PITT-CONSOL CHEMICALS - CONOCO)

849160392



E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

WILMINGTON, DELAWARE 19898

PETROCHEMICALS DEPARTMENT

120-8732  
May 14, 1986

Mr. Vincent Olivo  
Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, N.J. 07105

Dear Mr. Olivo:

PITT-CONSOL CHEMICAL COMPANY  
PERMIT NUMBER: 20401071-44100-0201

The Pitt-Consol Chemical Company facility at 191 Doremus Avenue, Newark, New Jersey ceased operating in August, 1983. During the next two years efforts were directed toward decontamination of process equipment. Waste water was discharged under existing permits during this time as reported in our quarterly self-monitoring reports to PVSC.

Dismantlement and disposal of the decontaminated equipment proceeded until March 1, 1986. During this period a corporate decision was made to prevent uncontrolled discharge of potentially contaminated water from the site by continuing to discharge water from the sumps to the PVSC per our permit.

During the dismantling period a voluntary program was initiated to investigate the quality and hydrology of the groundwater at the site. This program is continuing.

A groundwater monitoring permit has been applied for and a draft permit issued by NJDEP. (NJPDES Permit No. NJ0060704.)

While the future of this site is uncertain and no immediate plans to build are foreseen, it is known that at times of heavy precipitation the very high water table can result in inundation of portions of the site. Control over the disposal of this excess water, which may be polluted from subsurface deposits, can best be accomplished by occasional pumping of the existing sumps to the PVSC. The quality of this water would be similar to that discharged to the PVSC during the past year or so. Typical quarterly self-monitoring reports show ranges of BOD: 200-400 mg/l, and TSS: 10-100 mg/l.

The attached Exhibit A, is a detailed analysis of the sump discharge of September 14, 1984, during the period of equipment decontamination. While undoubtedly current discharge is of lower concentrations of pollutants the types found should be

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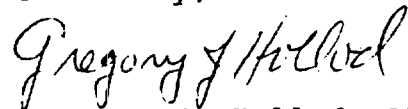
similar.

In addition to discharge from the sump to control excess accumulation of surface water, there is expected to be periodic pump tests of monitoring wells on the site, the discharge of which should be to the PVSC.

For reasons described above we request favorable consideration of our attached "Sewer Connection Application."

If you have any questions, please contact Gregory J. Hollod, E. I. du Pont de Nemours and Company, 1007 Market Street, Petrochemicals N-6545, Wilmington, DE. 19898. Phone number 302-774-4788.

Sincerely,



Gregory J. Hollod, Ph.D.  
Sr. Environmental Engineer

/dc

84

2 Attach.

Exhibit A - Sump Analysis

Exhibit B - Locations of sumps & sewer connection



EXHIBIT A  
SUMP ANALYSIS

**ny**  
**NEW YORK TESTING LABORATORIES, INC.**  
CALL BOX 1021, 75 URBAN AVENUE, WESTBURY, N.Y. 11590 • (516) 334-7770 • (212) 297-1449 TWX 510-222-0283

Lab. No. 84-73892

P.O. No. LMD 844 331M

September 26, 1984

REPORT OF TESTS

FOR

E.I. DUPONT DE NEMOUR  
1007 MAIN STREET  
WILMINGTON, DEL. 19898


Report prepared by:

Remo Gigante  
Laboratory Director

CERTIFICATION

We certify that this report is a  
true report of results obtained  
from our tests of this material.

Respectfully submitted,

  
G. J. Horvitz, Chief Officer

Att: Greg Hollod PhD

GJH/jw

RECEIVED  
OCT 3 1984

849160365

# NEW YORK TESTING LABORATORIES, INC.

Page 1.

Lab No. 84-73892

## 1.0 INTRODUCTION

The results we obtained on your samples are presented in a tabular format immediately after this introduction. Following the sample results, the Gas Chromatographic/Mass Spectral data generated in the analysis of your samples are included. A Quality Assurance Plan is listed in Paragraph 3.0, which includes objectives, project organization and responsibilities, sampling procedures, analytical procedures, calibration procedures, references and frequencies, data reduction, validation and reporting, internal quality control checks and frequencies, quality assurance performance audits, system audits and frequencies.

Also presented are the GC/MS calibration data and the internal standard, surrogate standard recoveries.

## 1.1 SAMPLE IDENTIFICATION

The submitted sample received on September 14, 1984 was identified as the following:

Pitt Consol, 9/14

849160366

## NEW YORK TESTING LABORATORIES, INC.

Page 2.

Lab No.84-73892

### 2.0 RESULTS

The results obtained on your samples are listed on the following pages. The compounds of interest are listed with their CAS (Chemical Abstract Services) number, method number, and the method detection limit. When a compound is searched for and cannot be found, it is reported as ND (not detected). When it is found at concentrations lower than the Method Detection Limit it is reported as < (MDL), otherwise the concentration is reported in  $\mu\text{g/l}$ .

The data on the recovery of the surrogates spiked into your samples are listed in Paragraph 5.0.

849160367

# NEW YORK TESTING LABORATORIES, INC.

Page 3

Lab No 84-73892

## VOLATILE COMPOUNDS:

Sample Number: Pitt Consol. 1984

Sample Size: 1 ml + 10  $\mu$ l

Internal Std. Concs.	Bromochloromethane	57
(total ngs.)	2-Bromo-1-chloropropane	26

Surrogate Std. Concs.	Deuteriochloroform	44
(total ngs.)	Deuterobenzene	28
	Deuterotoluene	28

<u>Parameter</u>	<u>Method No.</u>	<u>CAS No.</u>	<u>Method Detection Limit (ppb)*</u>	<u>Found (ppb)</u>
Acrolein	624	107-02-8	100	ND
Acrylonitrile	624	107-13-1	100	ND
Benzene	624	71-43-2	10	68
Bromodichloromethane	624	75-27-4	10	ND
Bromoform	624	75-25-2	10	ND
Bromomethane	624	74-83-9	10	ND
Carbon Tetrachloride	624	56-23-5	10	ND
Chlorobenzene	624	108-90-7	10	< 10
Chlorodibromomethane	624	124-48-1	10	ND
Chloroethane	624	75-00-3	10	ND
2-Chloroethyl vinyl ether	624	110-75-8	10	ND
Chloroform	624	67-66-3	10	< 10
Chloromethane	624	74-87-3	10	ND
1,2-Dichlorobenzene	624	95-50-1	10	ND
1,3-Dichlorobenzene	624	541-73-1	10	ND
1,4-Dichlorobenzene	624	106-46-7	10	ND

849160368

# NEW YORK TESTING LABORATORIES, INC.

Page 4

Lab No. 84-73892

## VOLATILE COMPOUNDS - cont'd.

Sample Number: Pitt Consol, 9/14

<u>Parameter</u>	<u>Method No.</u>	<u>CAS No.</u>	<u>Method Detection Limit (ppb)*</u>	<u>Found (ppb)</u>
Dichlorodifluoromethane	624	75-71-8	10	ND
1,1-Dichloroethane	624	75-34-3	10	< 10
1-2-Dichloroethane	624	107-06-2	10	ND
1,1-Dichloroethylene	624	75-35-4	10	ND
Trans-1,2-Dichloroethylene	624	156-60-5	10	ND
1,2-Dichloropropane	624	78-87-5	10	ND
1,3-Dichloropropene	624	10061-02-6	10	ND
Ethylbenzene	624	100-41-4	10	66
Methylene Chloride	624	75-09-2	10	ND
1,1,2,2-Tetrachloroethane	624	79-34-5	10	ND
Tetrachloroethylene	624	127-18-4	10	ND
Toluene	624	108-88-3	10	3442
1,1,1-Trichloroethane	624	71-55-6	10	ND
1,1,2-Trichloroethane	624	79-00-5	10	ND
Trichloroethylene	624	79-01-6	10	ND
Trichlorofluoromethane	624	75-69-4	10	ND
Vinyl Chloride	624	75-01-4	10	ND
Total Zylenes	-	-	-	181

ND = None Detected

< = Less than

\* EPA published method detection limit

849160369

# NEW YORK TESTING LABORATORIES, INC.

Page 5

Lab No. 84-73892

## BASE/NEUTRAL COMPOUNDS

Sample Number: Pitt Consol, 9/14

Final Extract Volume 1 ml

Sample Size : 900 ml

Volume Injected: 2 µl

Internal Std. Concs.(total ngs.)

d<sub>10</sub>-Anthracene 50

Surrogate Std. Concs.(total ngs.)

d<sub>8</sub>-Naphthalene 50

<u>Parameter</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Method Detection Limit (ppb)*</u>	<u>Found (ppb)</u>
Acenaphthene	625	83-32-9	10	ND
Acenaphthylene	625	208-96-8	10	ND
Anthracene	625	120-12-7	10	ND
Benzo (a) anthracene	625	56-55-3	10	ND
Benzo (b) fluoroanthene	625	205-99-2	10	ND
Benzo (k) fluoroanthene	625	207-08-9	10	ND
Benzo (a) pyrene	625	50-32-8	10	ND
Benzo (g,h,i) perylene	625	191-24-2	25	ND
Benzidine	625	92-87-5	10	ND
Bis (2-chloroethyl) ether	625	111-44-4	25	ND
Bis (2-chloroethoxy) methane	625	111-91-1	10	ND
Bis (2-ethylhexyl) phthalate	625	117-81-7	10	ND
Bis (2-chloroisopropyl) ether	625	39638-32-9	10	ND
4-Bromophenyl phenyl ether	625	101-55-3	10	ND
Butylbenzylphthalate	625	85-68-7	10	ND
2-Chloronaphthalene	625	91-58-7	10	ND

ND = None Detected

849160370

## NEW YORK TESTING LABORATORIES, INC.

Page 6

Lab No. 84-73892

BASE/NEUTRAL COMPOUNDS - cont'd.Sample Number: Pitt Consol, 9/14

<u>Parameter</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Method Detection Limit (ppb) *</u>	<u>Found (ppb)</u>
4-Chlorophenylphenylether	625	7005-72-3	10	ND
Chrysene	625	218-01-9	10	ND
Dibenzo (a,h) anthracene	625	53-70-3	25	ND
DiButyl phthalate	625	84-74-2	10	ND
3,3' -Dichlorobenzidine	625	91-94-1	10	ND
Diethylphthalate	625	84-66-2	10	ND
Dimethylphthalate	625	131-11-3	10	ND
2,4-Dinitrotoluene	625	121-14-2	10	ND
2,6-Dinitrotoluene	625	606-20-2	10	ND
Di-octyl-phthalate	625	117-84-0	10	ND
1,2-Diphenylhydrazine	625	112-66-7	10	ND
Fluoroanthene	625	206-44-0	10	ND
Fluorene	625	86-73-7	10	ND
Hexachlorobenzene	625	118-74-1	10	ND
Hexachlorobutadiene	625	87-68-3	10	ND
Hexachloroethane	625	67-72-2	10	ND
Hexachlorocyclopentadiene	625	77-47-4	10	ND
Indeno (1,2,3-cd) pyrene	625	193-39-5	10	ND
Isophorone	625	78-59-1	10	ND
Naphthalene	625	91-20-3	10	390
Nitrobenzene	625	98-95-3	10	ND

# NEW YORK TESTING LABORATORIES, INC.

Page 7

Lab No. 84-73892

## BASE/NEUTRAL COMPOUNDS - cont'd.

Sample Number: Pitt Consol, 9/14

<u>Parameter</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Method Detection Limit (ppb) *</u>	<u>Found (ppb)</u>
n-Nitrosodimethylamine	625	62-75-9	25	ND
n-Nitrosodi-N-propylamine	625	621-64-7	10	ND
n-Nitrosodiphenylamine	625	86-30-6	10	ND
Phenanthrene	625	85-01-8	10	ND
Pyrene	625	129-00-0	10	ND
1,2,4-Trichlorobenzene	625	120-82-1	10	ND
2,3,7,8-Tetrachlorodibenzo -p-dioxin	625	1746-01-6	--	ND

ND = None Detected

\* EPA published method detection limit

849160372



# NEW YORK TESTING LABORATORIES, INC.

Page 8

Lab No. 84-73892

## ACID COMPOUNDS:

Sample Number: Pitt Consol, 9/14

Final Extract Vol. 1 ml

Sample Size: 900 ml

Volume Injected: 2 µl

Internal Std. Concs. (total ngs.)

d10 Anthracene 50

Surrogate Std. Concs. (total ngs.)

pentafluorophenol 125

<u>Parameter</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Method Detection Limit (ppb)*</u>	<u>Found (ppb)</u>
4-Chloro-3-methylphenol	625	59-50-7	25*	ND
2-Chlorophenol	625	95-57-8	25	ND
2,4-Dichlorophenol	625	120-83-2	25	ND
2,4-Dimethylphenol	625	105-67-9	25	7403
2,4-Dinitrophenol	625	51-28-5	25	ND
2-Methyl-4-6-dinitrophenol	625	534-52-1	25	ND
2-Nitrophenol	625	88-75-5	25	ND
4-Nitrophenol	625	100-02-7	25	ND
Pentachlorophenol	625	87-86-5	25	ND
Phenol	625	108-95-2	25	16658
2,4,6-Trichlorophenol	625	88-06-02	25	ND

ND = None Detected

\*EPA published method detection limit

849160373

# NEW YORK TESTING LABORATORIES, INC.

Page 9

Lab No. 84-73892

## PESTICIDE COMPOUNDS:

Sample Number: Pitt Consol, 9/14

Sample Size: 300 mls

Extract Volume 1 ml

Volume Inj. 2.0  $\mu$ l

<u>Parameter</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Limit (ppb)</u>	<u>Found (ppb)</u>
Aldrin	608, 625	309-00-2	10*	ND
$\alpha$ -BHC	608, 625	319-84-6	10	ND
$\beta$ -BHC	608, 625	319-85-7	10	ND
$\delta$ -BHC	608, 625	319-86-8	10	ND
$\gamma$ -BHC	608, 625	58-89-9	10	ND
Chlordane	608, 625	57-74-9	10	ND
Dieldrin	608, 625	60-57-1	10	ND
$\alpha$ -Endosulfan	608, 625	959-98-8	10	ND
$\beta$ -Endosulfan	608, 625	33213-65-9	10	ND
Endosulfan sulfate	608, 625	1031-07-08	10	ND
Endrin	608, 625	72-20-8	10	ND
Endrin aldehyde	608, 625	7421-93-4	10	ND
Heptachlor	608, 625	76-44-8	10	ND
Heptachlor Epoxide	608, 625	1024-57-3	10	ND
4,4'-DDT	608, 625	50 29-3	10	ND
4,4'-DDE	608, 625	72-55-9	10	ND
4,4'-DDD	608, 625	72-54-8	10	ND
PCB 1016	608, 625	12674-11-2	10	ND
PCB 1221	608, 625	11104-28-2	10	ND
PCB 1232	608, 625	11141-16-5	10	ND
PCB 1242	608, 625	53469-21-9	10	ND
PCB 1248	608, 625	12672-29-6	10	ND
PCB 1254	608, 625	11097-69-7	10	ND
PCB 1260	608, 625	11096-82-5	10	ND
Toxaphene	608, 625	8001-35-2	10	ND

849160374

# NEW YORK TESTING LABORATORIES, INC.

Page 10

SAMPLE IDENTIFICATION NO. Pitt Consol, 9/14

Lab No. 84-73892

## METALS AND PHYSICAL CHEMISTRY

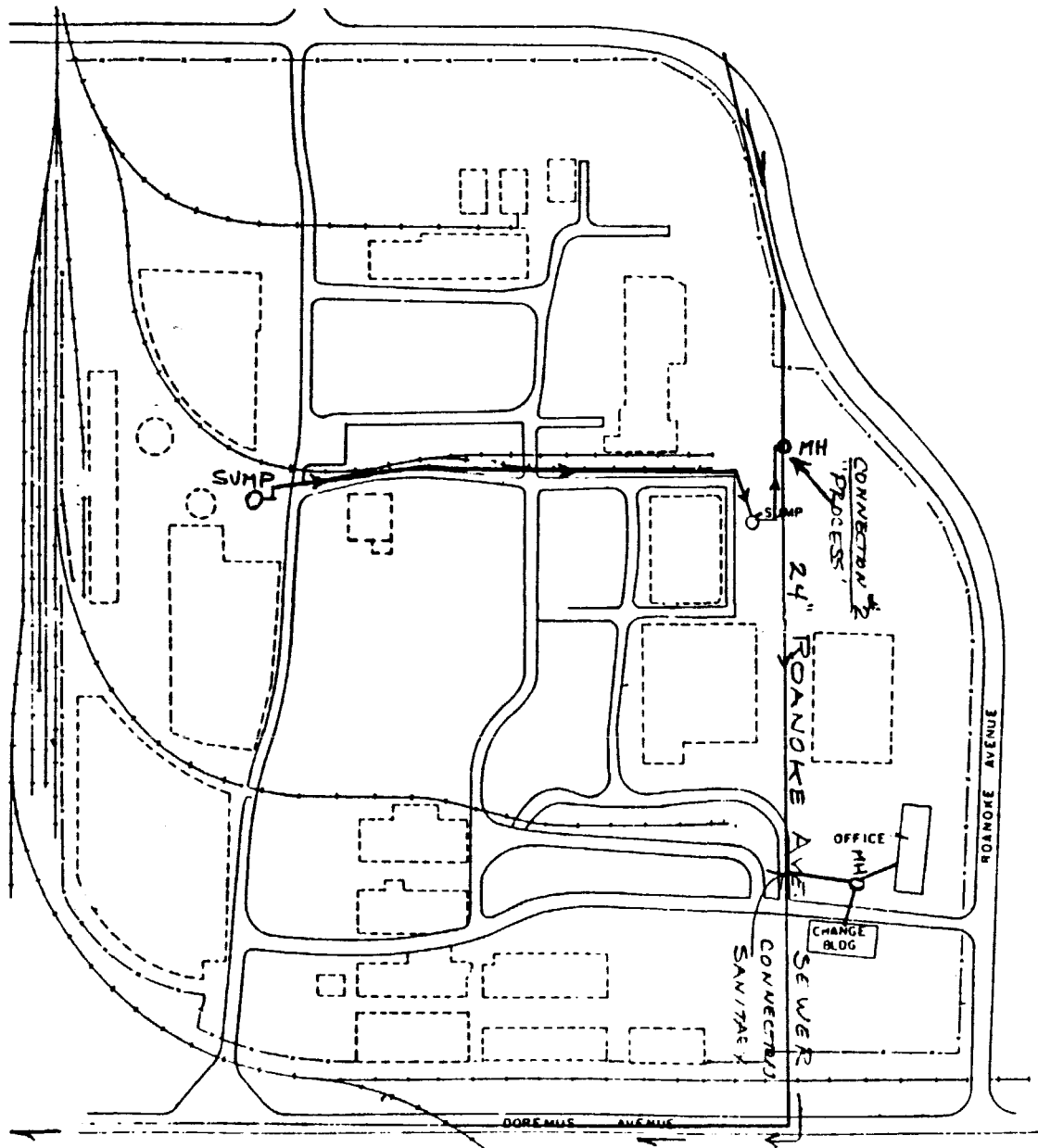
<u>Parameters (ug/l)</u>	<u>Method No.</u>	<u>CAS #</u>	<u>Method Detection Limit*</u>	<u>Found</u>
Cyanide, Total	335.2	57-12-5	20	80
Phenols, Total	420.1	--	5	159 x 10
Antimony	204.1	7440-36-0	200	< 100
Arsenic	206.2	7440-38-2	1	31
Beryllium	210.1	7440-41-7	5	< 3
Cadmium	213.1	7440-43-9	5	< 3
Chromium	218.1	7440-47-3	50	85
Copper	220.1	7550-50-8	20	63
Lead	239.1	7439-92-1	100	103
Mercury	245.1	7439-97-6	0.2	< 0.1
Nickel	249.1	7440-02-0	40	40
Selenium	270.2	7782-49-2	2	2
Silver	272.1	7440-22-4	10	< 6
Thallium	279.1	7440-28-0	100	< 50
Zinc	289.1	7440-66-6	5	230

< = Less than

\*EPA published method detection limit

849160375

# EXHIBIT B



## EXPLANATION

- RAILROADS
- ROADS
- FORMER TANK FARM AND FOUNDATIONS
- FENCE
- EXISTING BUILDINGS

SUMPS & SEWER  
CONNECTIONS

MAY 1986

PITT-CONSOL CHEMICAL CO. SITE  
NEWARK, NEW JERSEY  
E. I. DUPONT DE NEMOURS & CO.

849160376

Pitt-Consol-Newark

136-9324



ESTABLISHED 1802

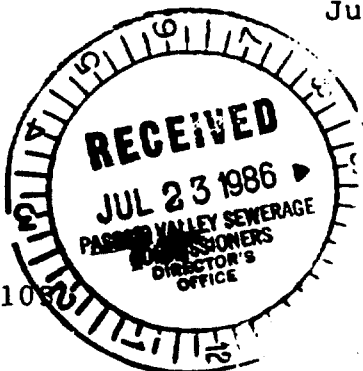
E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

WILMINGTON, DELAWARE 19898

PETROCHEMICALS DEPARTMENT

July 17, 1986

Mr. C. T. Perrapato  
Executive Director  
Passaic Valley  
Sewerage Commissioners  
600 Wilson Avenue  
Newark, New Jersey 07102



Dear Mr. Perrapato:

This letter is in response to your letter dated July 9, 1986 concerning activity at the Pitt-Consol site on Doremus Avenue in Newark, New Jersey. The necessary material for NJDEP Permit Number 0060704 has been submitted to the State of New Jersey, but no notification has been received by us on the status of this permit.

At the present time we are not discharging any water from the site. The sanitary line connection is in the process of being sealed and the storm water line will be connected in the near future. However, at the present time no water is being discharged to the Passaic River and will not be discharged until the appropriate permit has been obtained.

When I receive the permit package from the state for NJDEP Permit Number #0060704, I will forward the information to your office. In addition, once the storm sewere line has been connected I will notify you.

If you have any questions or require more information do not hesitate to call.

Sincerely,

*Gregory J. Hollod*

Gregory J. Hollod, Ph.D.  
Sr. Environmental Engineer

/dc  
11

— COMM.	— WS
— IP	— SL
— S	— IL
— GA	— OB
— ND	— AD
— BF	— RD
— VG	

7/24/86  
MG mth 7/86  
Tr -  
Pls follow up. We need to take  
action if they are still discharging.  
JMS



E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

WILMINGTON, DELAWARE 19898

PETROCHEMICALS DEPARTMENT

124-8903

*Pitt  
Consol  
Newark*

June 20, 1986

Mr. T. Mack  
Supervisor of Industrial Operations  
Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, N.J. 07105

Dear Mr. Mack:

Please do not renew the Sewer Connection Permit for the Pitt-Consol site. There is no manufacturing activity on the site. All surface water from precipitation will be diverted to the Passaic River via the existing storm sewer.

I appreciate your assistance with this action.

Sincerely,

Gregory J. Hollod, Ph.D.  
Sr. Environmental Engineer

/dc  
14

FOR AGENCY USE

## STANDARD FORM A-MUNICIPAL

## SECTION IV. INDUSTRIAL WASTE CONTRIBUTION TO MUNICIPAL SYSTEM

Submit a description of each major industrial facility discharging to the municipal system, using a separate Section IV for each facility description. Indicate the 4 digit Standard Industrial Classification (SIC) Code for the industry, the major product or raw material, the flow (in thousand gallons per day), and the characteristics of the wastewater discharged from the industrial facility into the municipal system. Consult Table III for standard measures of products or raw materials. (see instructions)

1. Major Contributing Facility  
(see instructions)

Name

401a

PITT-CONSOL CHEMICAL CO.

Number &amp; Street

401b

191 DOREMUS AVENUE

City

401c

NEWARK

County

401d

ESSEX

State

401e

NEW JERSEY

Zip Code

401f

07105

2. Primary Standard Industrial  
Classification Code (see  
instructions)

402

2869

3. Principal Product or Raw  
Material (see instructions)

Product

403a

CRESOLS, &amp; XYLENOLS

Raw Material

403b

PHENOLS &amp; METHANOLS

Quantity

Units (See  
Table III)

403c

403e

403d

403f

4. Flow Indicate the volume of water  
discharged into the municipal sys-  
tem in thousand gallons per day  
and whether this discharge is inter-  
mittent or continuous.

404a

141 thousand gallons per day

404b

☐ Intermittent (Int) ☒ Continuous (con)5. Pretreatment Provided Indicate if  
pretreatment is provided prior to  
entering the municipal system

405

☐ Yes☒ No6. Characteristics of Wastewater  
(see instructions)

Parameter Name	COLOR	TS	TSS	TURB.	CHLOR.	SULFATES	BOD	COD	T
406a Parameter Number	00100	00500	00530	00070	00940	00945	00310	00340	00
406b Value	7200	340	28	560	107	133	4200	6800	1
Cr (Tot)	Zn	PHENOLS							
01034	01092	32730							
1.5	.52	1100							

849160379

5/81

JOSEPH M. KEEGAN  
CHAIRMAN

THOMAS J. CIFELLI  
VICE CHAIRMAN

VINCENT CORRADO  
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CHARLES A. LAGOS  
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS

600 WILSON AVENUE  
NEWARK, N. J. 07105  
(201) 344-1800



CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROCCO D. RICCI  
CHIEF ENGINEER

CHARLES C. CARELLA  
CHIEF COUNSEL

NORMAN E. DARMSTATTER  
CLERK

September 18, 1980

Pitt-Consol Chemicals  
Conoco Inc.  
191 Doremus Avenue  
Newark, New Jersey 07105

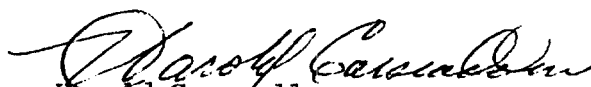
ATTENTION: William F. Revelt

Dear Mr. Revelt:

As requested, we are attaching a copy of the lab results from our sampling study at your plant.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONER

  
Harold Carscadden,  
Technician

HC/saj

849160380



SAMPLE ID -G50

July 25, 1979

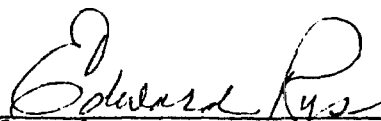
11:50 AM

Pitt Consol, main sanitary sewer on property, Newark

Tan translucent liquid  
pungent industrial odor  
fine tannish suspended matter  
Slight tannish-brown sediment

Turbidity - 304  
pH - 2.2  
TSS - 70  
VSS - 70  
MSS - 0  
Chlorides - 870  
COD - 3440  
H<sub>2</sub>SO<sub>4</sub> present ✓  
Orth-Phosphate - 0  
TOC - 1080  
BOD - 1230

Taken by: V. Roselli  
T. Mack

  
Edward Rys, Chemist I

ER:jc

APPROVED

  
Director of Sanitation Control

849160381

SAMPLE ID-G49

July 25, 1979

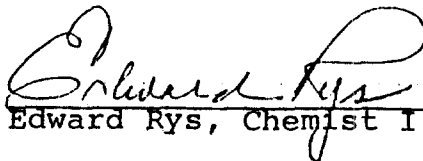
11:55 AM

Pitt Consol, process water as it enters main sanitary sewer, Newark

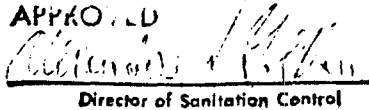
Tan translucent liquid  
Fine tan suspended matter  
Industrial odor  
Slight tannish-brown sediment

Turbidity - 236  
pH - 7.2  
TSS - 25  
VSS- 20  
MSS - 5  
Chlorides - 100  
COD - 5120  
TOC - 1840  
BOD - 3060

Taken by: V. Roselli  
T. Mack

  
Edward Rys, Chemist I

ER:jc

APPROVED  
  
Director of Sanitation Control

849160382

SAMPLE ID-G51

July 25, 1979

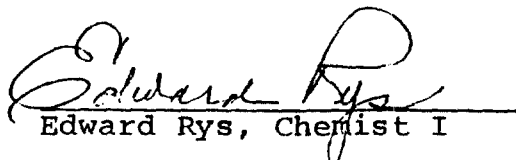
12:00 NOON

Pitt Consol, from round sump outlet after skimming, Newark

Tan translucent liquid  
Trace of fine tan suspended matter  
Industrial odor  
Trace of tan sediment

Turbidity - 264  
pH - 7.2  
TSS - 37  
VSS - 37  
MSS - 0  
Chlorides - 100  
COD 4640  
TOC - 1760  
BOD - 1920

Taken by: T. Mack  
V. Roselli

  
Edward Rys, Chemist I

ER:jc

APPROVED

  
Director of Sanitation Control

849160383

July 25, 1979

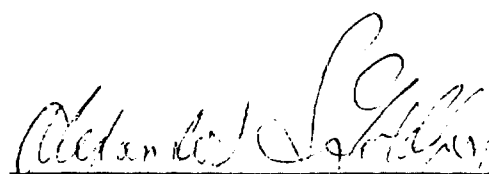
Solid Tar-Like Sample From Pitt-Consol ID-G52

Sampled by T. Mack & V. Roselli

This black solid tar-like mass contains granular sandy particles. The material is very soft as well as easily friable and appears to be material from fairly recent production.

1. The material burns readily and supports combustion until completely consumed-leaving behind a very gritty sandy residue. While burning it gives off an odor resembling burning rubber.
2. It is soluble in both alkyl and aryl solvents as well as both hydrophobic and hydrophilic solvents. Three solvents were used; benzol, carbon tetrachloride and acetone.
3. The dissolved organic substance was filtered off leaving behind a residue of granular sandy particles as well as a large number of fibers.
4. The sample was dried and burned with the following results:

Percent solids	84%
Percent volatile	27.9%
Percent mineral	72.1%

  
Alexander S. Goldberg

ASG:jc

849160384

SAMPLE NO. ID-G56

July 27, 1979

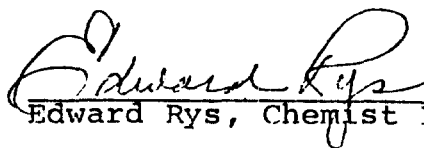
9:50 AM

Pitt Consol, Main Line Sanitary Sewer on Property, Newark

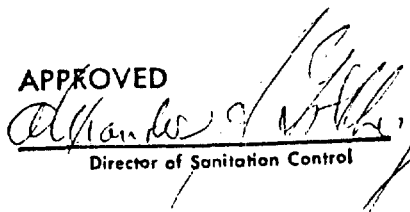
Tan translucent liquid  
Fine amber tan suspended matter  
Pungent industrial odor  
Moderate amber-tan sediment

pH 2.6

Taken by: V. Roselli  
J. Dondero

  
Edward Rys, Chemist I

ER:jd

APPROVED  
  
Director of Sanitation Control

849160385

CONOCO

Curry L. Miller  
Plant Manager

Pitt-Consol Chemicals  
Continental Oil Company  
191 Doremus Avenue  
Newark, New Jersey 07105  
(201) 344-3800

March 10, 1975

Mr. Walter J. Davis, Chairman  
Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, New Jersey 07105

Dear Sir:

Attached is the completed Waste Effluent Survey for  
the Pitt-Consol Chemical Company Plant as requested  
in your letter of February 14, 1975.

If there are any further questions, please let us  
know.

Sincerely,

*Curry L. Miller*

mp  
Attachment

*Curry L. Miller*  
*March 10, 1975*

849160386

## STANDARD FORM A-MUNICIPAL

MCI  
Flow

## SECTION IV. INDUSTRIAL WASTE CONTRIBUTION TO MUNICIPAL SYSTEM

Submit a description of each major industrial facility discharging to the municipal system, using a separate Section IV for each facility description. Indicate the 4 digit Standard Industrial Classification (SIC) Code for the industry, the major product or raw material, the flow (in thousand gallons per day), and the characteristics of the wastewater discharged from the industrial facility into the municipal system. Consult Table III for standard measures of products or raw materials. (see instructions)

1. Major Contributing Facility  
(see instructions)

Name

401a

Pitt-Consol Chemical Co.

Number &amp; Street

401b

191 Doremus Avenue

City

401c

Newark

County

401d

Essex

State

401e

New Jersey

Zip Code

401f

07101

2869

2. Primary Standard Industrial  
Classification Code (see  
instructions)

402

3. Principal Product or Raw  
Material (see instructions)

Quantity

Units (S  
Table II)

Product

403a

Cresylic Acids, Anti

Oxidants

Raw Material

403b

Phenol, Methanol

Cresylic Acids

4. Flow Indicate the volume of water  
discharged into the municipal sys-  
tem in thousand gallons per day  
and whether this discharge is inter-  
mittent or continuous.

404a

72 thousand gallons per day ( 7 day week)

404b

☐ Intermittent (int) ☒ Continuous (con)5. Pretreatment Provided Indicate if  
pretreatment is provided prior to  
entering the municipal system

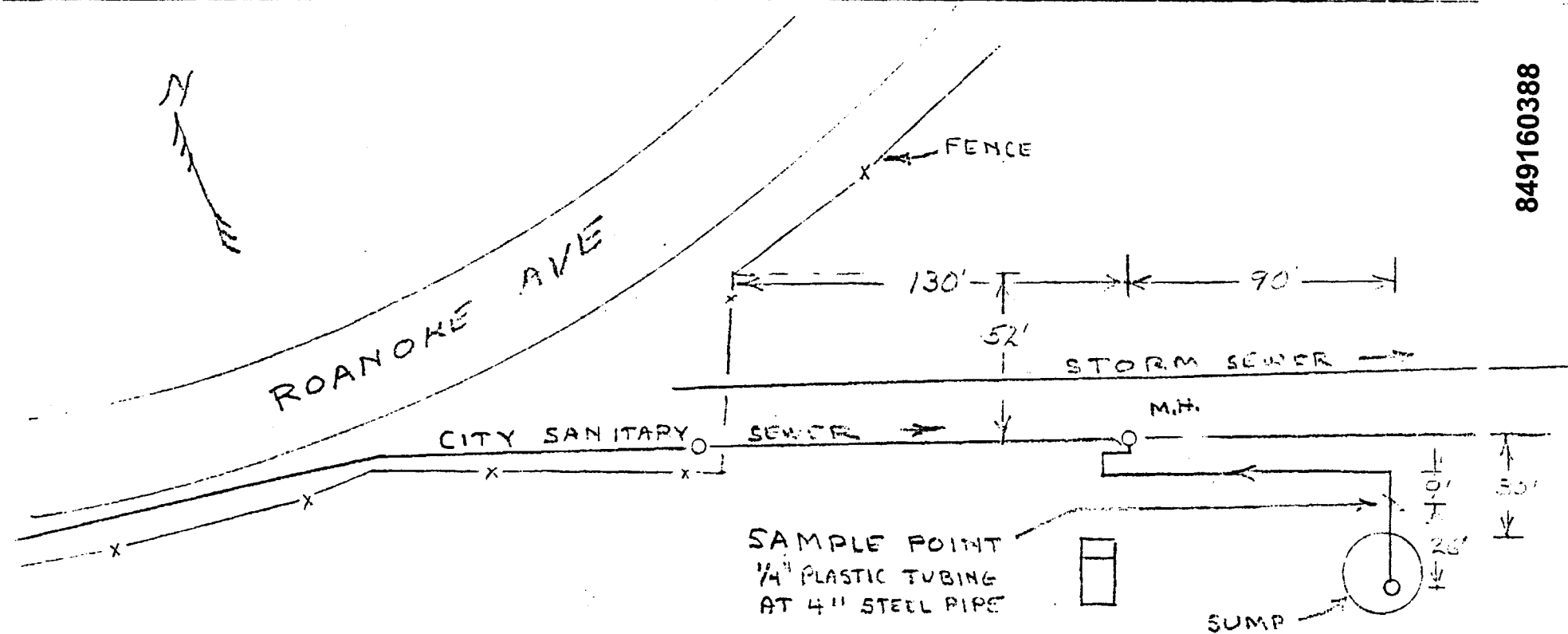
405

☐ Yes ☒ No6. Characteristics of Wastewater  
(see instructions)

Parameter Name	PHENOL	CRESOL	XYLENE	UC	CN	TS	OIL	COD	BOD
405a Parameter Number	32730	---	---		00720	00500	00550	00340	00
405b Value	780	403	168		0.014	2375	286	2340	73

TSS Cl TDC Fe  
00530 00940 00680 001045  
61 34.5 1546 0.58

849160387



SEWER SAMPLING POINT

PITT-CONSOL CHEMICALS

NEWARK N.J.

SCALE: 1"=50'

DATE: 1-1-54

DATE: 2-12-54

OLD  
COOLING TOWER

P.R. CAR LOADING

TANK  
FARM



CARMINE T. PERRAPATO  
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CHARLES A. LAGOS  
COMMISSIONERS

PASSAIC VALLEY SEWERAGE COMMISSIONERS

600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800



SEYMOUR A. LUBETKIN  
CHIEF ENGINEER

CHARLES C. CARELLA  
CHIEF COUNSEL

MRS. CHARLES T. SCHAEDEL  
CLERK-TREASURER

July 25, 1977

Charles C. Carella, Esq.  
Gateway 1 - 24th Floor  
Newark, New Jersey

Re: Pitt-Consol Chemicals  
Newark, New Jersey

Dear Mr. Carella:

Enclosed you will find a letter from Pitt-Consol Chemicals, which is self-explanatory. We do not believe we need a minimum notice, and as far as we are concerned, any industry could withdraw with an extremely short notice. I think, however, in order that paper work be processed, it might be proper to state a 30 day notice would be considered sufficient, although, I do not believe our permit need be modified to state this.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS

S. A. Lubetkin,  
Chief Engineer

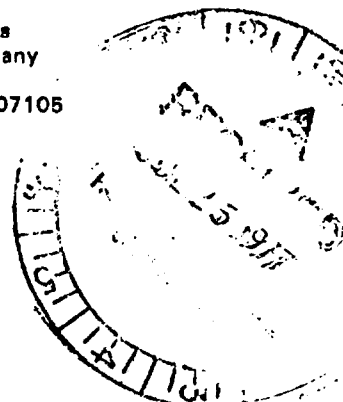
SAL/ipg

849160389

**CONOCO**

Curry L. Miller  
Plant Manager

Pitt-Consol Chemicals  
Continental Oil Company  
191 Doremus Avenue  
Newark, New Jersey 07105  
(201) 344-3800



July 22, 1977

Mr. Seymour Lubetkin  
Chief Engineer  
Passaic Valley Sewerage Commissioners  
600 Wilson Avenue  
Newark, New Jersey 07105

Dear Mr. Lubetkin:

As an industrial user, we wish to continue discharging industrial waste water into the City of Newark sanitary sewer and thereby to the Passaic Valley Sewerage treatment plant. Therefore, the Industrial Sewer Connection Application for our plant has been completed.

Two questions need to be resolved before we can submit the application, however. We are a wholly owned affiliate of Continental Oil Company and control of this plant is through the Chemical Division of Continental Oil Company. Therefore, the individual we propose to sign the application is a Vice President of Continental Oil Company's Chemical Division who is in charge of all chemical operations. It is our opinion that the authority delegated to a Vice President is sufficient that no resolution from the board of directors should be required.

Pitt-Consol Chemical Company has no board of directors, and obtaining a resolution from Continental Oil Company's board will be very time consuming and seems inappropriate considering the size of the company. Is the signature of the Vice President sufficient without the resolution?

The other question concerns terms of the agreement. I note in the rules and regulations that the Passaic Valley Sewerage Commission has the right to change permit class or cancel permits after giving six months notice. It is also conceivable that an industry could decide to withdraw from the system due to economics, etc. Is there any minimum notice specified for such a situation? In other words, is there a minimum term to this agreement?

Page 2 of 2

July 22, 1977

Passaic Valley Sewerage Commissioners

Thank you for considering these questions, and I look forward to your reply so that the permit application can be submitted.

Respectfully yours,

*Curry L. Miller*

Curry L. Miller  
Plant Manager

mp

849160391